

Suzan DeBusk Paiva
Assistant General Counsel
Pennsylvania



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October 11, 2011

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: Core Communications, Inc.
v. Verizon Pennsylvania Inc. and Verizon North LLC;
Docket Nos. P-2011-2263650, C-2011-2253750 and C-2011-2253777

Dear Secretary Chiavetta:

Enclosed please find the Motion for Admission *Pro Hac Vice* of Deborah L. Kuhn on behalf of Verizon Pennsylvania Inc. and Verizon North LLC, being filed in the above captioned matter.

If you have any questions, please feel free to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "Suzan D. Paiva".

Suzan D. Paiva

SDP/slb

Via E-Mail and Federal Express
cc: The Honorable Susan D. Colwell

Via E-Mail and First Class U.S. Mail
cc: Attached Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Motion for Admission Pro Hac Vice of Deborah L. Kuhn upon the parties, listed below, in accordance with the requirements of §1.54 (relating to service by a party) and 1.55 (related to service upon attorneys).

Dated at Philadelphia, Pennsylvania, this 11th day of October, 2011.

Via E-Mail and First Class Mail

Michael A Gruin, Esquire
Stevens & Lee
17 North Second St., 16th Fl.
Harrisburg, PA 17101

Renardo Hicks
R. L. Hicks & Associates
17 North Second St., 16th Fl.
Harrisburg, PA 17101

Counsel for Core Communications Inc.



Suzan D. Paiva
Pennsylvania Bar ID No. 53853
1717 Arch Street, 3rd Floor
Philadelphia, PA 19103
(215) 466-4755

Attorney for Verizon

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

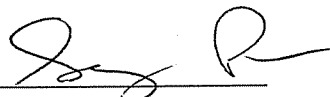
CORE COMMUNICATIONS, INC.,	:	
	:	
Complainant,	:	
	:	Docket No. P-2011-2253650
v.	:	Docket No. C-2011-2253750 and
	:	Docket No. C-2011-2253787
VERIZON PENNSYLVANIA INC.	:	
and VERIZON NORTH LLC	:	
Respondents.	:	

**MOTION FOR ADMISSION OF DEBORAH L. KUHN
PRO HAC VICE ON BEHALF OF
VERIZON PENNSYLVANIA INC. AND VERIZON NORTH LLC**

I, Suzan D. Paiva, an attorney in good standing and authorized to practice in the Commonwealth of Pennsylvania, hereby move the Pennsylvania Public Utility Commission, in accordance with 52 Pa. Code § 1.22(b) and the Pennsylvania Bar Admission Rules, 204 Pa. Code Rule 301, to permit Deborah L. Kuhn, a member of the bar of the State of Illinois (A.R.D.C. No. 06225391), to appear *pro hac vice* in the above captioned matter on behalf of Verizon Pennsylvania Inc. and Verizon North LLC (collectively, "Verizon"). The Verified Statement of Suzan D. Paiva is attached to and relied upon in support of this Motion.

I hereby certify that copies of this motion and the attached Verified Statements have been served upon all parties of record in the above-captioned matter.

Respectfully submitted,



Suzan D. Paiva (Atty No. 53853)

Verizon

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E-Mail: Suzan.d.paiva@verizon.com

Counsel for Verizon

October 11, 2011

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CORE COMMUNICATIONS, INC.,	:	
	:	
Complainant,	:	
	:	Docket No. P-2011-2253650
vi.	:	Docket No. C-2011-2253750 and
	:	Docket No. C-2011-2253787
VERIZON PENNSYLVANIA INC.	:	
and VERIZON NORTH LLC	:	
Respondents.	:	

VERIFIED STATEMENT OF
SUZAN D. PAIVA

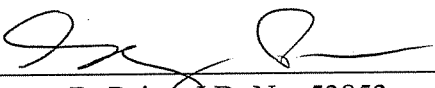
I, Suzan D. Paiva, hereby state as follows:

1. I am Assistant General Counsel for Verizon in the state of Pennsylvania.
2. I am admitted to practice law in the Commonwealth of Pennsylvania and am in good standing with all courts and administrative agencies of the Commonwealth.
3. I regularly practice before the Pennsylvania Public Utility Commission.
4. I have never been suspended, disbarred or disciplined by any court or administrative agency, nor am I subject to any proceeding for suspension, disbarment or disciplinary action.
5. After reasonable investigation, I reasonably believe Deborah L. Kuhn, the candidate for admission *pro hac vice* before the Pennsylvania Public Utility Commission, to be a reputable and competent attorney.
6. I am in a position to recommend the admission *pro hac vice* of Deborah L. Kuhn.

7. If there should be any proceeds from the settlement of this proceeding, such proceeds shall be received, held and distributed and accounted for in accordance with Rule 1.15 of the Pennsylvania Rules of Professional Conduct, including the IOLTA provisions thereof, if applicable.

8. The foregoing statements are true to the best of my knowledge, information and belief. I understand that the statements herein are made subject to the penalties of 18 Pa. C. S. § 4904, relating to unsworn falsification to authorities.

DATED: October 11, 2011



Suzan D. Paiva, J.D. No. 53853

Verizon

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Suzan.d.paiva@verizon.com

Counsel for

Verizon Pennsylvania Inc. and Verizon North LLC

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CORE COMMUNICATIONS, INC.,	:	
	:	
	:	
Complainant,	:	
	:	Docket No. P-2011-2253650
vii.	:	Docket No. C-2011-2253750 and
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VERIZON PENNSYLVANIA INC.	:	
and VERIZON NORTH LLC	:	
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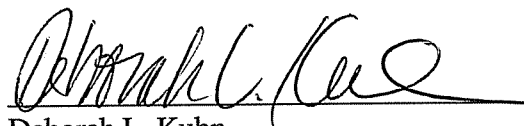
VERIFIED STATEMENT OF DEBORAH L. KUHN

Pursuant to 52 Pa. Code §§ 1.22(b) and 5.103 and Pa. B.A.R. 301 and 1012.1, Suzan Paiva, Esquire, a member of the bar of the Commonwealth of Pennsylvania (Attorney ID No. 53853), is moving for my admission *pro hac vice* in the above-captioned proceeding. In support of said sponsor's motion, I, the candidate, Deborah L. Kuhn, submit this verified statement, pursuant to Rule 1012.1:

1. I am admitted to practice in and am a member in good standing of the Bar of the State of Illinois (A.R.D.C. No. 06225391).
2. I never have been suspended, disbarred or otherwise disciplined nor am I currently the subject of any disciplinary proceeding.
3. I am not currently admitted *pro hac vice* in any pending action in any court of record or administrative proceeding in Pennsylvania.
4. I shall comply with and be bound by the applicable statutes, case law, and procedural rules of the Commonwealth of Pennsylvania, including the Pennsylvania Rules of Professional Conduct, and shall submit to the jurisdiction of the Pennsylvania courts and the Pennsylvania Disciplinary Board with respect to acts and omissions occurring during the appearance in the matter for which admission *pro hac vice* is being sought.

5. I do consent to the appointment of the sponsoring attorney, Suzan Paiva, Esquire, as the agent upon whom service of process shall be made for all actions, including disciplinary actions, that may arise out of the practice of law in the matter for which admission *pro hac vice* is sought.
6. If there should be any proceeds from the settlement of this proceeding, such proceeds shall be received, held and distributed and accounted for in accordance with Rule 1.15 of the Pennsylvania Rules of Professional Conduct, including the IOLTA provisions thereof, if applicable.
7. I verify that the foregoing statements are true to the best of my knowledge, information and belief. I understand that the statements herein are made subject to the penalties of 18 Pa. C. S. § 4904, relating to unsworn falsification to authorities.

DATED: October 6, 2011



Deborah L. Kuhn
Assistant General Counsel
Verizon
205 N. Michigan Ave., 7th Floor
Chicago, IL 60601
312-260-3326
deborah.kuhn@verizon.com

*Counsel for
Verizon Pennsylvania Inc.
and Verizon North LLC*

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CORE COMMUNICATIONS, INC.,	:	
	:	
Complainant,	:	
	:	Docket No. P-2011-2253650
viii.	:	Docket No. C-2011-2253750 and
	:	Docket No. C-2011-2253787
VERIZON PENNSYLVANIA INC.	:	
and VERIZON NORTH LLC	:	
Respondents.	:	

**ORDER GRANTING MOTION FOR ADMISSION
PRO HAC VICE OF DEBORAH L. KUHN**

Upon consideration of the Motion for Admission *Pro Hac Vice* of Deborah L. Kuhn, it is
this ____ day of October, 2011,

ORDERED that the Motion is hereby GRANTED; and it is further

ORDERED that Deborah L. Kuhn is admitted *pro hac vice* for the purposes of
representing Verizon Pennsylvania Inc. and Verizon North LLC in the above-captioned action.

Susan D. Colwell
Administrative Law Judge