

Suzan DeBusk Paiva  
Assistant General Counsel



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June 9, 2014

**Via Electronic Filing**

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

Re: Core Communications, Inc. v. Verizon Pennsylvania LLC  
Docket No. C-2014-2406550

Dear Secretary Chiavetta:

Enclosed please find the Motion for Admission *Pro Hac Vice* of Deborah L. Kuhn on behalf of Verizon Pennsylvania 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 Verizon's Motion for Admission *Pro Hac Vice* of Deborah L. Kuhn on behalf of Verizon Pennsylvania LLC, 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 9<sup>th</sup> day of June, 2014.

**Via E-Mail and First Class Mail**

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

Christopher F. Van de Verg, Esquire \*\*  
General Counsel  
Core Communications, Inc.  
209 West Street, Suite 302  
Annapolis, MD 21401

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

Attorney for Verizon

\*\* Service being made by e-mail only

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>CORE COMMUNICATIONS, INC.,</b>	:	
	:	
<b>Complainant,</b>	:	
	:	
v.	:	<b>Docket No. C-2014-2406550</b>
	:	
<b>VERIZON PENNSYLVANIA LLC,</b>	:	
	:	
<b>Respondent.</b>	:	

**MOTION FOR ADMISSION OF DEBORAH L. KUHN  
*PRO HAC VICE* ON BEHALF OF  
VERIZON PENNSYLVANIA 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 LLC (“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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*Counsel for Verizon Pennsylvania LLC*

June 9, 2014

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>CORE COMMUNICATIONS, INC.,</b>	:	
	:	
<b>Complainant,</b>	:	
	:	
v.	:	<b>Docket No. C-2014-2406550</b>
	:	
<b>VERIZON PENNSYLVANIA LLC,</b>	:	
	:	
<b>Respondent.</b>	:	

**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: June 9, 2014



Suzan D. Paiva, I.D. No. 53853

Verizon

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*Counsel for*

*Verizon Pennsylvania LLC*

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>CORE COMMUNICATIONS, INC.,</b>	:	
	:	
<b>Complainant,</b>	:	
	:	
v.	:	<b>Docket No. C-2014-2406550</b>
	:	
<b>VERIZON PENNSYLVANIA LLC,</b>	:	
	:	
<b>Respondent.</b>	:	

**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 D. 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 currently admitted *pro hac vice* in one pending action in a court of record or administrative proceeding in Pennsylvania, the matter before the Pennsylvania Public Utility Commission of Core Communications, Inc. v. Verizon Pennsylvania Inc. and Verizon North LLC, consolidated at Dockets No. P-2011-2253650, C-2011-2253750 and C-2011-2253787.

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 D. 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: June 6, 2014



Deborah L. Kuhn  
Assistant General Counsel  
Verizon  
205 N. Michigan Ave., 7<sup>th</sup> Floor  
Chicago, IL 60601  
312-894-2354  
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*Counsel for  
Verizon Pennsylvania LLC*

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>CORE COMMUNICATIONS, INC.,</b>	:	
	:	
<b>Complainant,</b>	:	
	:	
v.	:	<b>Docket No. C-2014-2406550</b>
	:	
<b>VERIZON PENNSYLVANIA LLC,</b>	:	
	:	
<b>Respondent.</b>	:	

**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 June, 2014,

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 LLC in the above-captioned action.

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Susan D. Colwell  
Administrative Law Judge