

Suzan DeBusk Paiva
Associate General Counsel



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April 8, 2020

VIA ELECTRONIC FILING

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

Re: Verizon Pennsylvania LLC and Verizon North LLC v. Metropolitan Edison Company, Pennsylvania Electric Company, and Pennsylvania Power Company; Docket No. C-2020-3019347

Dear Secretary Chiavetta:

Enclosed for filing on behalf of Verizon Pennsylvania LLC and Verizon North LLC is the Motion for Admission Pro Hac Vice of Curtis L. Groves in the above-referenced proceeding.

Copies of the enclosed Motion have been served in accordance with the attached Certificate of Service.

Should you have any questions or concerns, please contact me.

Very truly yours,

A handwritten signature in blue ink that reads "Suzan D. Paiva/sau".

Suzan D. Paiva

SDP/sau
Enclosures

cc: Honorable Joel Cheskis

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Verizon Pennsylvania LLC	:	
and Verizon North LLC	:	
	:	
Complainants,	:	
	:	
v.	:	Docket No. C-2020-3019347
	:	
Metropolitan Edison	:	
Company, Pennsylvania Electric	:	
Company, and Penn Power	:	
Company,	:	
	:	
Respondents.	:	

**MOTION FOR ADMISSION *PRO HAC VICE* OF
CURTIS L. GROVES ON BEHALF OF VERIZON
PENNSYLVANIA LLC 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 Curtis L. Groves, a member of the District of Columbia bar (Bar No. 497472), to appear *pro hac vice* in the above captioned matter on behalf of Verizon Pennsylvania LLC and Verizon North 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 ID No. 53853)
Verizon
900 Race St., 6th Floor
Philadelphia, PA 19107
Telephone: 267-768-6184

Suzan.D.Paiva@verizon.com

Attorney for Verizon Pennsylvania LLC
and Verizon North LLC.

Dated: April 8, 2020

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Verizon Pennsylvania LLC	:	
and Verizon North LLC	:	
	:	
Complainants,	:	
	:	
v.	:	Docket No. C-2020-3019347
	:	
Metropolitan Edison	:	
Company, Pennsylvania Electric	:	
Company, and Penn Power	:	
Company,	:	
	:	
Respondents.	:	

VERIFIED STATEMENT OF SUZAN D. PAIVA

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

1. I am Associate 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 Curtis L. Groves, 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 Curtis L. Groves.
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, if applicable.

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



Suzan D. Paiva (Atty ID No. 53853)
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Telephone: 267-768-6184

Suzan.D.Paiva@verizon.com

Attorney for Verizon Pennsylvania LLC
and Verizon North LLC.

Dated: April 8, 2020

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Verizon Pennsylvania LLC	:	
and Verizon North LLC	:	
	:	
Complainants,	:	
	:	
v.	:	Docket No. C-2020-3019347
	:	
Metropolitan Edison	:	
Company, Pennsylvania Electric	:	
Company, and Penn Power	:	
Company,	:	
	:	
Respondents.	:	

VERIFIED STATEMENT OF CURTIS L. GROVES

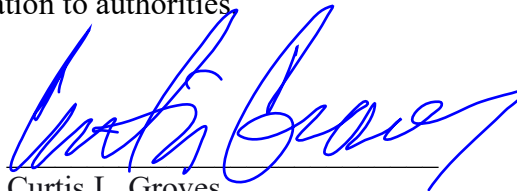
Pursuant to 52 Pa. Code §§ 1.22(b) and 5.103 and Pa. B.A.R. 301 and 1012.1, Suzan D. Paiva, Esquire, a member of the Bar of the Commonwealth of Pennsylvania (Attorney ID No. 53853), is moving for my admission *pro hac vice* in the above-captioned proceeding. In support of said sponsor’s motion, I, the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

1. I am admitted to practice and am a member in good standing of the Bar in the District of Columbia (Bar No. 497472).
2. I have never been suspended, disbarred or otherwise disciplined, nor am I currently the subject of any disciplinary proceeding.
3. 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 the acts and omissions occurring during the appearance in the matter for which *pro hac vice* is being sought.

4. 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.

5. 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.

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



Curtis L. Groves
Verizon
1300 I Street NW
Suite 500 East
Washington, DC 20005
(202) 515-2179
curtis.groves@verizon.com

Attorney for Verizon Pennsylvania LLC
and Verizon North LLC.

Dated: April 6, 2020

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Verizon Pennsylvania LLC	:	
and Verizon North LLC	:	
	:	
Complainants,	:	
	:	
v.	:	Docket No. C-2020-3019347
	:	
Metropolitan Edison	:	
Company, Pennsylvania Electric	:	
Company, and Penn Power	:	
Company,	:	
	:	
Respondents.	:	

**ORDER GRANTING MOTION FOR ADMISSION
PRO HAC VICE OF CURTIS L. GROVES**

Upon consideration of the Motion for Admission *Pro Hac Vice* of Curtis L. Groves, it is
this ___ of April, 2020,

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

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

Joel H. Cheskis
Deputy Chief Administrative Law Judge

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

VERIZON PENNSYLVANIA LLC AND :
VERIZON NORTH LLC :
 :
 Docket No. C-2020-3019347
 v. :
 :
METROPOLITAN EDISON COMPANY, :
PENNSYLVANIA ELECTRIC COMPANY, :
AND PENNSYLVANIA POWER COMPANY :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Motion for Admission Pro Hac Vice upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by electronic mail as follows:

Tori L. Giesler
tgiesler@firstenergycorp.com

Administrative Law Judge Joel Cheskis
jcheskis@pa.gov

Curtis L. Groves
Curtis.groves@verizon.com

Christopher S. Huther
Cevans@wileyrein.com

Claire J. Evans
Cevans@wileyrein.com



Dated: April 8, 2020

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and Verizon North LLC