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April 15, 2021

Via Electronic Filing

Rosemary Chiavetta, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Lucy & Cassandra Scipio v. PECO Energy Company & Liberty Power Holdings LLC;
Docket No. F-2020-3022548

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Motion for Admission *Pro Hac Vice* of Liberty Power Holdings LLC in the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

Sarah C. Stoner

Sarah C. Stoner

Enclosure

cc: Honorable F. Joseph Brady (fbrady@pa.gov) w/ enc.
Pamela McNeal (pmcneal@pa.gov) w/ enc.
Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the foregoing document, upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via First Class Mail and/or Email

Lucy & Cassandra Scipio

Khadijah Scott, Esq.
PECO Energy Company
2301 Market Street
23rd Floor
Philadelphia, PA 19103
khadijah.scott@exeloncorp.com

Dated: April 15, 2021

Sarah C. Stoner

Sarah C. Stoner
Counsel for Respondent
Liberty Power Holdings LLC

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

LUCY & CASSANDRA SCIPIO	:	
	:	
v.	:	DOCKET NO. F-2020-3022548
	:	
PECO ENERGY COMPANY & LIBERTY POWER HOLDINGS LLC	:	

NOTICE TO PLEAD

TO: Parties of Record

You are hereby notified that a responsive pleading to the enclosed **Motion for Admission *Pro Hac Vice* of Liberty Power Holdings LLC** must be filed within 20 days of the date of service. All responsive pleadings must be filed with the Secretary of the Pennsylvania Public Utility Commission with a copy served to counsel for Liberty Power Holdings and the Administrative Law Judge assigned this matter.

File with:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

With a copy to:

Sarah C. Stoner, Esquire
Attorney ID No.: 313793
Eckert Seamans Cherin & Mellott, LLC
213 Market St., 8th Floor
Harrisburg, PA 17101
sstoner@eckertseamans.com

Due to the COVID-19 pandemic, the Pennsylvania Public Utility Commission is encouraging individuals to eFile documents. Information regarding eFiling with the Commission is available at <https://www.puc.pa.gov/filing-resources/efiling/>.

Sarah C. Stoner

Date: April 15, 2021

Sarah C. Stoner, Esquire
Attorney for Liberty Power Holdings LLC

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

LUCY & CASSANDRA SCIPIO :
 :
 v. : DOCKET NO. F-2020-3022548
 :
 PECO ENERGY COMPANY & :
 LIBERTY POWER HOLDINGS LLC :

**LIBERTY POWER HOLDINGS LLC’S MOTION
FOR ADMISSION *PRO HAC VICE***

Pursuant to 52 Pa. Code §§ 1.22, Pa. B.A.R. 301(a) and Pa. R.C.P. 1012.1(d)(1) Sarah C. Stoner, of Eckert Seamans Cherin & Mellott, LLC moves for the admission *pro hac vice* of Stephen Gibelli, Esquire to appear on behalf of Liberty Power Holdings LLC in this proceeding.

1. In support of this Motion, a Verified Statement of Sarah C. Stoner, Esquire is attached hereto as Exhibit A and a Verified Statement of Stephen Gibelli, Esquire is attached hereto as Exhibit B.

2. The candidate is a member of good standing of the jurisdictions listed in Exhibit B and he has never been suspended, disbarred or otherwise disciplined by any court or administrative body.

3. Mr. Stephen Gibelli is specifically qualified to participate in this action as he serves as General Counsel for Liberty Power Holdings LLC and has extensive public utility law experience.

4. *Pro hac vice* appearance before the Pennsylvania Public Utility Commission is the equivalent to appearance before a special court, and no fee paid to the Pennsylvania Interest on

Lawyers' Trust Accounts Board ("IOLTA Board") is therefore required for Mr. Gibelli to appear *pro hac vice* before the Commission.¹

5. Liberty Power Holdings LLC has requested that Mr. Gibelli be admitted to represent the company in this proceeding.

WHEREFORE, the undersigned respectfully move that Stephen Gibelli, Esquire be admitted to appear *pro hac vice* on behalf of Liberty Power Holdings LLC in this proceeding.

Respectfully submitted,

Sarah C. Stoner

Deanne M. O'Dell, Esq.
Attorney ID No.: 81064
Sarah C. Stoner, Esq.
Attorney I.D. No.: 313793
Eckert Seamans Cherin & Mellott, LLC
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dodell@eckertseamans.com
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Date: April 15, 2021

Counsel for Liberty Power Holdings LLC

¹ 204 Pa. Code §§ 81.505(c).

Exhibit A
Verification of Sarah C. Stoner, Esquire

I, the undersigned, do hereby certify and state under penalty of perjury and subject to the penalties provided by 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities) that the following facts are true and correct to the best of my knowledge, information or belief:

1. I am an attorney with the law firm of Eckert Seamans Cherin & Mellott, LLC, my office is located in Harrisburg, Pennsylvania, and I am a resident of Pennsylvania.
2. I currently represent Liberty Power Holdings LLC in this matter and will continue to serve as the attorney of record for this proceeding.
3. I am a member in good standing of the Commonwealth of Pennsylvania (bar number 313793).
4. After reasonable investigation, I reasonably believe that Mr. Stephen Gibelli is a reputable and competent attorney and I recommend his admission *pro hac vice*.
5. Currently, I am sponsoring another attorney admitted *pro hac vice* in a Pennsylvania Public Utility Commission proceeding.
6. Any proceeds from any settlement in this matter shall be received, held, distributed and accounted for in accordance with Rule 1.15 of the Pennsylvania Rules of Professional Conduct, including the IOLTA provisions thereof, if applicable.

Respectfully submitted,

Sarah C. Stoner

Sarah C. Stoner, Esquire
Attorney ID No.: 313793
Eckert Seamans Cherin & Mellott, LLC
213 Market St., 8th Floor
Harrisburg, PA 17101
Tel (717) 237-6000
Fax (717) 237-6019
sstoner@eckertseamans.com

Date: April 15, 2021

Exhibit B
Verification of Stephen Gibelli, Esquire

I, the undersigned, do hereby certify and state under penalty of perjury and subject to the penalties provided by 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities) that the following facts are true and correct to the best of my knowledge, information or belief:

1. I am an attorney who is not currently admitted to the bar of the Commonwealth of Pennsylvania and am seeking permission to appear *pro hac vice* before the Pennsylvania Public Utility Commission on behalf of Liberty Power Holdings LLC in this matter.

2. I am Designated Florida Authorized House Counsel for Liberty Power Corporation. I am admitted to practice in Connecticut (bar number 428178) and Massachusetts (bar number 631266) and a member in good standing.

3. I am not nor have I ever been suspended, disbarred, or otherwise disciplined in any court or administrative body. I am not, nor have I ever been subject to any disciplinary proceedings.

4. I have never been denied *pro hac vice* admission in any proceeding.

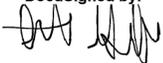
5. I am currently General Counsel of Liberty Power Holdings LLC and have extensive public utility law experience.

6. If granted *pro hac vice* admission, I will comply with and be bound by the applicable statutes, case law and procedural rules of the Pennsylvania Public Utility Commission and, as applicable, the Commonwealth of Pennsylvania, including the Pennsylvania Rules of Professional Conduct.

7. If granted *pro hac vice* admission, I agree to submit to the jurisdiction of the Pennsylvania Public Utility Commission and, to the extent applicable, the Pennsylvania courts and the Pennsylvania Disciplinary Board with respect to acts and omissions occurring during my *pro hac vice* admission.

8. I consent to the appointment of Sarah C. Stoner of the law firm of Eckert Seamans Cherin & Mellott, LLC 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 this matter for which *pro hac vice* admission is sought.

Respectfully submitted,

DocuSigned by:

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Date: April 14, 2021

Stephen Gibelli, Esq.
General Counsel
Liberty Power Holdings, LLC
2100 W. Cypress Creek Rd., Suite 130
Fort Lauderdale, FL 33309
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sgibelli@libertypowercorp.com