



Brian Deeney
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May 6, 2021

VIA E-FILING

Rosemary Chiavetta, Secretary
Secretary's Bureau
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

Re: Florence Parker Chaila v. Metropolitan Edison Company et al.
Docket No.: C-2021-3024417

Dear Ms. Chiavetta:

Enclosed for filing, please find the Motion for Admission Pro Hac Vice of John Coyle, Esq. in the above referenced matter.

Thank you for your kind attention to this matter.

Very truly yours,

Brian C. Deeney

Brian Deeney for
LEWIS BRISBOIS BISGAARD & SMITH LLP

BD:pl

cc: Hon. John Coogan (ALJ)
Margaret Morris, Esq.
Florence R. Parker Chaila, JD

PENNSYLVANIA PUBLIC UTILITY COMMISSION

FLORENCE R. PARKER CHAILLA,
CLAIMANT,
V.

Docket No. C-2021-3024417

METROPOLITAN EDISON COMPANY AND CHOICE
ENERGY, LLC d/b/a 4 CHOICE ENERGY

RESPONDENTS.

**CHOICE ENERGY, LLC d/b/a 4 CHOICE ENERGY'S MOTION FOR ADMISSION
PRO HAC VICE**

Pursuant to Rule 5.103 of the rules of Administrative Practice and Procedure of the Pennsylvania Public Utility Commission and 52 Pa. Code SECTION 1.22, attorney of record from Choice Energy, LLC d/b/a 4 Choice Energy ("Choice Energy"), Brian C. Deeney, respectfully requests an Order granting admission *pro hac vice* to John Coyle, Esq. as counsel for Choice Energy for all purposes in relation to this proceeding. In support of this Motion, Choice Energy avers as follows:

1. Brian C. Deeney is an active member of the Bar of the Pennsylvania Supreme Court (ID: 312184). Pursuant to 52 Pa. Code § 1.24(b)(1), and has entered his appearance as counsel of record for Choice Energy in this matter.

2. John Coyle, Esq. is a Partner at the law firm of Coyle Law Group LLP, which is located at 55 Madison Avenue, Suite 400, Morristown, NJ 07960, and serves as national counsel for Choice Energy. He is admitted to practice law in New Jersey (Attorney ID: 029632001) and is currently in good standing. Mr. Coyle has never been suspended or disbarred by any jurisdiction.

3. Mr. Coyle agrees to be bound by and comply with the applicable statutes, case law, and procedural rules of the Commonwealth of Pennsylvania, the Pennsylvania Rules of

Professional Conduct, and the Rules of this Commission. Mr. Coyle agrees to submit to the jurisdiction of the Pennsylvania Courts and Pennsylvania Disciplinary Board with respect to acts and omission occurring during his appearance in this matter.

4. Mr. Coyle has consented to the appointment of Brian C. Deeney as his sponsor, who has filed his notice of appearance in this matter and who will remain counsel of record on behalf of Choice Energy.

WHEREFORE, Choice Energy respectfully moves for the admission of John Coyle to appear in this matter *pro hac vice* for Choice Energy for all permissible purposes in relation to this proceeding.

LEWIS BRISBOIS BISGAARD & SMITH LLP

/s/ Brian C. Deeney

Brian C. Deeney, Esq.

Attorney ID: 312184

One Riverfront Plaza,

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Brian.Deeney@lewisbrisbois.com

Date: 5/5/21

PENNSYLVANIA PUBLIC UTILITY COMMISSION

FLORENCE R. PARKER CHAILLA,
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Docket No. C-2021-3024417

METROPOLITAN EDISON COMPANY AND CHOICE
ENERGY, LLC d/b/a 4 CHOICE ENERGY

RESPONDENTS.

**SPONSOR'S VERIFIED STATEMENT IN SUPPORT OF MOTION FOR ADMISSION
PRO HAC VICE**

I, Brian C. Deeney, state the following:

1. I am a member of good standing with the Bar of the Supreme Court of Pennsylvania (Attorney ID: 312184) and am acting as sponsor for the *pro hac vice* admission of John Coyle, Esq. to appear before the Pennsylvania Public Utility Commission in this matter.
2. I have known Mr. Coyle for several years, and I believe him to be a reputable and competent attorney.
3. I am sponsoring Mr. Coyle's admission *pro hac vice* in this matter.
4. Any proceeds from the settlement of a cause of action in which Mr. Coyle is granted admission *pro hac vice* 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.
5. I shall remain the attorney of record for this case, as requested by the Pennsylvania Rules of Civil Procedure.
6. I verify that the facts set forth herein are true and correct, to the best of my knowledge, information and belief, and that I would be able to prove the same if a hearing were

held regarding such facts. I understand that the statements are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to falsifications to authorities).

LEWIS BRISBOIS BISGAARD & SMITH LLP

/s/ Brian C. Deeney

Brian C. Deeney, Esq.

Attorney ID: 312184

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Date: 5/5/21

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RESPONDENTS.

**VERIFIED STATEMENT OF JOHN COYLE IN SUPPORT OF MOTION FOR
ADMISSION PRO HAC VICE**

I, John Coyle, state the following:

1. I am admitted to practice in and am a member in good standing of the bar of New Jersey (Attorney ID: 029632001). I have never been suspended, disbarred, or otherwise disciplined, nor am I currently the subject of an disciplinary proceeding.
2. I have never appeared before the Pennsylvania Public Utility Commission.
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 Profession Conduct.
4. I 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 consent to the appointment of the sponsoring attorney, Brian C. Deeney, 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. I verify that the facts set forth herein are true and correct, to the best of my knowledge, information and belief, and that I would be able to prove the same if a hearing were held regarding such facts. I understand that the statements are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to falsifications to authorities).

Coyle Law Group LLP



John Coyle
55 Madison Avenue,
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(973) 370-0592
jcoyle@coylelawgroup.com

Date: 5/5/21

PENNSYLVANIA PUBLIC UTILITY COMMISSION

FLORENCE R. PARKER CHAILLA,
CLAIMANT,
V.

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METROPOLITAN EDISON COMPANY AND CHOICE
ENERGY, LLC d/b/a 4 CHOICE ENERGY

RESPONDENTS.

CERTIFICATE OF SERVICE

I, Brian C. Deeney, hereby certify that on May 6, 2021, have served copies of the Notice of Appearance. via email to:

The Honorable John M. Coogan
Administrative Law Judge
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120
jcoogan@pa.gov

Florence R. Parker Chaila, JD
P. O. Box 1111
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thebusiness2@yahoo.com

Margaret A. Morris, Esq.
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2929 Arch Street
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mmorris@regerlaw.com

LEWIS BRISBOIS BISGAARD & SMITH LLP

/s/ Brian C. Deeney

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Date: 5/6/21

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