



Brian Deeney
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Direct: 973.792.8726

May 7, 2021

VIA E-FILING

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

Re: Application of All Choice Energy MidAtlantic LLC
Electric: A-2021-302-24563
Natural Gas: A-2021-3024607

Dear Ms. Chiavetta:

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

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. Elizabeth Barnes (ALJ)
Julie Steamer, Esq.
Michael Gruinn, Esq.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of All Choice Energy MidAmerica LLC :
for approval to supply electricity or electric :
generation services as a supplier of electricity to the : A-2021-3024563
public in the service territories of PECO Energy :
Company and PPL Electric Utilities Corporation :

Application of All Choice Energy MidAmerica LLC :
for approval to supply natural gas services as a :
supplier or aggregator engaged in the business : A-2021-3024607
of supplying natural gas services in the service :
territories of PECO Energy Company, Philadelphia :
Gas Works and UGI Utilities

CHOICE ENERGY, LLC'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 records from Choice Energy, LLC (“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 these proceedings. 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 these matters.

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 these matters.

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 these matters *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,

1037 Raymond Blvd, Ste. 800

Newark, NJ 07102

973.792.8726 (Phone)

973.577.6261 (Fax)

Brian.Deeney@lewisbrisbois.com

Date: 5/5/21

**BEFORE THE
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**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 these matters.
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 for admission *pro hac vice* in one other matter in a court of Pennsylvania: *Florence R. Parker Chaila v. Metropolitan Edison Company and Choice Energy, LLC d/b/a 4 Choice Energy* (Docket No.: C-2021-3024417), before this Commission.
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.

6. 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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**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 a pending motion to appear *pro hac vice* before the Pennsylvania Public Utility Commission in the matter of *Florence R. Parker Chaila v. Metropolitan Edison Company and Choice Energy, LLC d/b/a 4 Choice Energy* (Docket No.: C-2021-3024417).

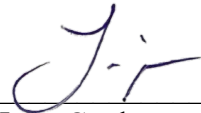
3. I shall comply with and be bound by the applicable statutes, case law, and procedural rules of the Commonwealth of Pennsylvania, including the Pennsylvania Rules of Profession Conduct.

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,
Suite 400
Morristown, NJ 07960
(973) 370-0592
jcoyle@coylelawgroup.com

Date: 5/5/21

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CERTIFICATE OF SERVICE

I, Brian C. Deeney, hereby certify that on May 7, 2021, have served copies of the Notice
of Appearance. via email to:

The Honorable Elizabeth H. Barnes
Administrative Law Judge
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120
ebarnes@pa.gov

Julie Steamer, Esq.
Michael A. Gruin, Esq.
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86 Fleet Place 86
Suite 32E
Brooklyn, NY 11201
jsteamer@steamerhart.com
Representing All Choice Energy MidAmerica LLC

LEWIS BRISBOIS BISGAARD & SMITH LLP

/s/ Brian C. Deeney

Brian C. Deeney, Esq.

Attorney ID: 312184

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