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November 23, 2021

Via Electronic Filing

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

Re: Joint Application of The United Telephone Company of Pennsylvania LLC d/b/a CenturyLink; CenturyTel Broadband Services, LLC; Connect Holding LLC; and Lumen Technologies, Inc. for All Approvals of a General Rule Transfer of Control and Registration of Securities; Docket Nos. A-2021-3028668; A-2021-3028669

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Motion for Admission *Pro Hac Vice* of the United Telephone Company of Pennsylvania, LLC, CenturyTel Broadband Services, LLC, Connect Holding LLC, and Lumen Technologies, Inc. ("Joint Applicants") with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

Sarah C. Stoner

Sarah C. Stoner

SCS/lww
Enclosure

cc: Hon. Marta Guhl w/enc. (mguhl@pa.gov)
Athena Delvillar w/enc. (sdelvillar@pa.gov)
Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the Joint Applicants' Motion for Admission *Pro Hac Vice* 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

Barrett Sheridan, Esq.
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Sue Benedek, Esquire
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Howard J. Symons, Esq.
John L. Flynn, Esq.
Jenner & Block LLP
1099 New York Ave., NW, Suite 900
Washington, DC 20001-4412
hsymons@jenner.com
jflynn@jenner.com

Dated: November 23, 2021

Sarah C. Stoner

Sarah C. Stoner, Esq.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Application of The United Telephone :
Company of Pennsylvania LLC d/b/a : Docket No. A-2021-3028668
CenturyLink; CenturyTel Broadband : Docket No. A-2021-3028669
Services, LLC; Connect Holding LLC; and :
Lumen Technologies, Inc. for All Approvals :
of a General Rule Transfer of Control and :
Registration of Securities :

**UNITED TELEPHONE COMPANY OF PENNSYLVANIA LLC D/B/A
CENTURYLINK; CENTURYTEL BROADBAND SERVICES, LLC;
CONNECT HOLDING LLC; AND LUMEN TECHNOLOGIES, INC.’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 Howard J. Symons, Esquire and John L. Flynn, Esquire to appear on behalf of Connect Holding LLC (“Connect Holding”) in this proceeding.

1. In support of this Motion, a Verified Statement of Sarah C. Stoner, Esquire is attached hereto as Exhibit A, a Verified Statement of Howard J. Symons is attached hereto as Exhibit B, and a Verified Statement of John L. Flynn, Esquire is attached hereto as Exhibit C.

2. The candidates are a member of good standing of the jurisdictions listed in their respective Verified Statements and they have never been suspended, disbarred or otherwise disciplined by any court or administrative body.

3. Mr. Howard J. Symons is specifically qualified to participate in this action as he is a Partner at Jenner & Block and has extensive experience representing clients in telecommunications transactions.

4. Mr. John L. Flynn is specifically qualified to participate in this action as he is a Partner at Jenner & Block and has extensive experience representing clients in telecommunications transactions.

5. *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. Howard J. Symons and Mr. John L. Flynn to appear *pro hac vice* before the Commission.¹

6. Connect Holding has requested that Mr. Howard J. Symons and Mr. John L. Flynn be admitted to represent Connect Holding in this proceeding.

7. The Joint Applicants have consulted with OCA and OSBA and neither party has expressed an objection to the granting of the Motion.

WHEREFORE, the undersigned respectfully move that Mr. Howard J. Symons, Esquire and Mr. John L. Flynn, Esquire be admitted to appear *pro hac vice* on behalf of Connect Holding in this proceeding.

Respectfully submitted,

Sarah C. Stoner

Sarah C. Stoner, Esquire
Attorney I.D. No. 313793
Eckert Seamans Cherin & Mellott
213 Market Street, 8th Floor
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Tel.: 717-237-6026
sstoner@eckertseamans.com

Dated: November 23, 2021

Counsel for the Joint Applicants

¹ 204 Pa. Code §§ 81.505(c).

Exhibit A
Verified Statement 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 the Joint Applicants 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. Howard J. Symons and Mr. John L. Flynn are reputable and competent attorneys and I recommend their admission *pro hac vice*.

5. Currently, I am sponsoring attorneys admitted *pro hac vice* in three other Pennsylvania proceedings.

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 I.D. No. 313793
Eckert Seamans Cherin & Mellott
213 Market Street, 8th Floor
Harrisburg, PA 17101
Tel.: 717-237-6026
sstoner@eckertseamans.com

Dated: November 23, 2021

Counsel for the Joint Applicants

Exhibit B
Verification of Howard J. Symons, 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 Connect Holding LLC in this matter.

2. I am admitted to practice in the District of Columbia (bar number 256917) and am 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 a Partner at Jenner & Block, and have more than 40 years of experience in telecommunications law and policy.

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.

Exhibit B
Verification of Howard J. Symons, Esquire

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.

/s/ Howard J. Symons

Howard J. Symons, Esquire
Jenner & Block LLP
1099 New York Avenue, NW, Suite 900
Washington, DC 20001-4412
Tel.: 202-639-6000
hsymons@jenner.com

Dated: November 17, 2021

Exhibit C
Verification of John L. Flynn, 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 Connect Holding LLC in this matter.

2. I am admitted to practice in the District of Columbia (bar number 484793) and in California (bar number 196294) and am 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 a Partner at Jenner & Block, and in that role I serve as co-chair of the firm's Communications, Internet, and Technology Practice. I represent telecom, media and technology companies in a wide variety of matters and represent companies in telecommunications transactions.

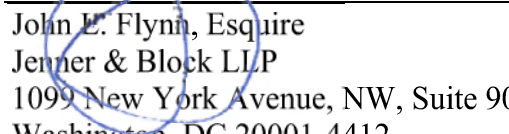
6. If granted *pro hac vice* admission, I will comply with and be bound by the applicable statutes, case law and procedural rules of the Pennsylvania Public Utility Commission and, as applicable, the Commonwealth of Pennsylvania, including the Pennsylvania Rules of Professional Conduct.

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

Exhibit C
Verification of John L. Flynn, Esquire

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.



John E. Flynn, Esquire
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Dated: November 22, 2021