

August 29, 2022

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
Harrisburg, PA 17105-3265

Re: Robert Adams v. Zito Media Voice, LLC
Docket No. C-2022-3032837
Motion for Admission *Pro Hac Vice*

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Motion for Admission *Pro Hac Vice* of Maria T. Browne on behalf of Zito Media Voice, LLC in the above-referenced proceeding.

As evidenced by the attached Certificate of Service, all parties to the proceeding are being served with a copy of this document. If you have any questions regarding this filing, please direct them to me. Thank you for your attention to this matter.

Sincerely,

DAVIS WRIGHT TREMAINE LLP



Nellie Dunderdale

cc: Certificate of Service (w/ encl.)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54.

Service by U.S. Mail and Email:

The Honorable Dennis Buckley
Administrative Law Judge
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor East
P.O. Box 3265
Harrisburg, PA 17120
debuckley@pa.gov

Robert Adams
514 Julian Pike
Julian, PA 16844
(814) 355-2998
Radams223@yahoo.com

/s/ Nellie Dunderdale

Nellie Dunderdale

NOTICE TO PLEAD

You are hereby notified that a responsive pleading to the enclosed Motion for Pro Hac Vice must be filed within twenty (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 Zito and the Administrative Law Judge assigned to this matter.

File with:

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

With a copy to:

Nellie Dunderdale
Davis Wright Tremaine LLP
1301 K Street NW, Suite 500 East
Washington, D.C. 20005
Tel: (202) 973-4267
Fax: (202) 973-4467
nelliedunderdale@dwt.com

The Honorable Dennis Buckley
Administrative Law Judge
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor East
P.O. Box 3265
Harrisburg, PA 17120
debuckley@pa.gov

**COMMONWEALTH OF PENNSYLVANIA
BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Robert Adams	:	
	:	
Complainant	:	
	:	
v.	:	C-2022-3032837
	:	
Zito Media Voice, LLC	:	
	:	
Respondent	:	

MOTION FOR ADMISSION *PRO HAC VICE*

Pursuant to Section 5.103 of the Pennsylvania Public Utility Commission’s (“Commission”) regulations, 52 Pa. Code §§ 1.22(b), 1.23, 5.103, Pennsylvania Bar Admission Rule 301, and 231 Pa. Code § 1012.1(d)(1), I, Nellie Dunderdale, as counsel to Zito Media Voice, LLC (“Zito”), respectfully request that Your Honor enter an order granting admission *pro hac vice* to Maria T. Browne, as counsel to Zito, for all purposes related to the above-referenced proceeding. In support thereof, I, Nellie Dunderdale, hereby state as follows:

1. Pursuant to Section 1.24(b)(1) of the Commission’s regulations, 52 Pa. Code § 1.24(b)(1), I have entered my appearance as counsel for Zito in this proceeding, am an active member of the Bar of the Commonwealth of Pennsylvania (Pa. Attorney I.D. No. 321891), and am an Associate of Davis Wright Tremaine LLP, with my principal office located in Washington, D.C.
2. Maria T. Browne is a Partner of Davis Wright Tremaine LLP, whose principal office is located at 1301 K St NW Suite 500, Washington, DC 20005.
3. Maria T. Browne is a 1992 graduate of The George Washington University School of Law. She is a member in good standing of the Commonwealth of Virginia Bar since 1992 and the

District of Columbia Bar since 1993. Maria T. Browne has never been suspended, disbarred, or been the subject of disciplinary proceedings in any state.

4. Maria T. Browne has significant experience and expertise representing cable operators, telecommunications service providers, and broadband service providers in matters before the Federal Communications Commission (“FCC”) and state public service commissions. She has previously appeared before the FCC and state regulatory bodies in numerous states including Connecticut, California, Florida, Georgia, Massachusetts, New Hampshire, New Jersey, New York, Washington, D.C., Vermont, and Virginia.

5. Wherefore, I, Nellie Dunderdale, respectfully move for admission of Maria T. Browne, *pro hac vice*, on behalf of Zito for all permissible purposes related to the above-referenced proceeding.

Dated: August 29, 2022

Respectfully submitted,
/s/ Nellie Dunderdale
Nellie Dunderdale
(Pa. Attorney I.D. No. 321891)
Davis Wright Tremaine LLP
1301 K Street NW, Suite 500 East
Washington, D.C. 20005
Tel: (202) 973-4267
Fax: (202) 973-4467
nelliedunderdale@dwt.com

**COMMONWEALTH OF PENNSYLVANIA
BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Robert Adams	:	
	:	
Complainant	:	
	:	
v.	:	C-2022-3032837
	:	
Zito Media Voice, LLC	:	
	:	
Respondent	:	

**VERIFIED STATEMENT OF NELLIE DUNDERDALE, SPONSOR OF MARIA T.
BROWNE, FOR ADMISSION *PRO HAC VICE***

Pursuant to 52 Pa. Code §§ 1.22(b) and 5.103 and Pa. Bar Admission Rule 301 and 231 Pa. Code § 1012.1, Nellie Dunderdale, a member of the Bar of the Commonwealth of Pennsylvania (Pa. Attorney I.D. No. 321891), is moving for the admission *pro hac vice* of Maria T. Browne in the above-referenced proceeding. In support of the Motion, I, Nellie Dunderdale, submit this Verified Statement pursuant to 231 Pa. Code § 1012.1:

1. I have had sufficient opportunity to conduct a reasonable investigation regarding Maria T. Browne and can state that I reasonably believe her to be a reputable and competent attorney and I am in a position to recommend her admission.

2. I am not presently acting as the sponsor for admission *pro hac vice* in any other cases in this Commonwealth.

3. Any proceeds from the settlement of a cause of action in which Maria T. Browne 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 Pennsylvania Interest on Lawyers' Trust Accounts (IOLTA) Board provisions thereof, if applicable.

4. I aver that *pro hac vice* appearance before the Pennsylvania Public Utility Commission is the equivalent to appearance before a special court, and that no fee paid to the IOLTA Board is therefore required for Ms. Browne to appear *pro hac vice* in the above-referenced proceeding. *See* 204 Pa. Code § 81.505(c).

5. I shall remain the attorney of record in this case, as required 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).

Dated: August 29, 2022

Respectfully submitted,
/s/ Nellie Dunderdale
Nellie Dunderdale
(Pa. Attorney I.D. No. 321891)
Davis Wright Tremaine LLP
1301 K Street NW, Suite 500 East
Washington, D.C. 20005
Tel: (202) 973-4267
Fax: (202) 973-4467
nelliedunderdale@dwt.com

**COMMONWEALTH OF PENNSYLVANIA
BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Robert Adams	:	
	:	
Complainant	:	
	:	
v.	:	C-2022-3032837
	:	
Zito Media Voice, LLC	:	
	:	
Respondent	:	

VERIFIED STATEMENT OF MARIA T. BROWNE FOR ADMISSION *PRO HAC VICE*

Pursuant to 52. Pa. Code §§ 1.22(b) and 5.103 and Pa. Bar Admission Rule 301 and 231 Pa. Code § 1012.1, Nellie Dunderdale, a member of the Bar of the Commonwealth of Pennsylvania (Pa. Attorney I.D. No. 321891), is moving for my admission *pro hac vice* in the above-referenced proceeding. In support of the Motion, I submit this Verified Statement pursuant to 231 Pa. Code § 1012.1:

1. I am admitted to practice in and am a member of good standing in the Bar of the Commonwealth of Virginia, having been admitted in 1992. My Virginia attorney identification number is 34746.
2. I am admitted to practice in and am a member of good standing in the Bar of the District of Columbia, having been admitted in 1993. My District of Columbia attorney identification number is 438770.
3. I am not, nor have I ever been suspended, disbarred, or otherwise disciplined nor am I currently the subject of any disciplinary proceeding in any state.
4. I have not previously applied for admission *pro hac vice* before the Commission before any court of record in Pennsylvania.

5. If granted admission *pro hac vice*, 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.

6. If granted admission *pro hac vice*, I 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.

7. I consent to the appointment of the sponsor 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.

8. 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. Const. Stat. § 4904 (relating to falsifications to authorities).

Dated: August 29, 2022

Respectfully submitted,
/s/ Maria Browne
Maria T. Browne
(Virginia Bar No. 34746)
(District of Columbia Bar No. 438770)
Davis Wright Tremaine LLP
1301 K Street NW Suite 500 East
Washington, D.C. 20005-3317
Tel: (202) 973-4281
Fax: (202) 973-4481
mariabrowne@dwt.com