

COMMONWEALTH OF PENNSYLVANIA

PENNSYLVANIA PUBLIC UTILITY COMMISSION

VICTORIA PIOTROWSKI,

CLAIMANT,

v.

Docket No. C-2023-3038896

CHOICE ENERGY, LLC
D/B/A 4 CHOICE ENERGY

RESPONDENT.

**CHOICE ENERGY, LLC d/b/a 4 CHOICE ENERGY'S
MOTION FOR ADMISSION PRO HAC VICE
OF JOHN D. COYLE**

Pursuant to Rule 5.103 of the Rules of Administrative Practice and Procedure of the Pennsylvania Public Utility Commission and 52 Pa. Code § 1.22, the undersigned attorney of record for Choice Energy, LLC d/b/a 4 Choice Energy (“Choice Energy”), Donald A. Soutar, respectfully requests an Order granting admission *pro hac vice* to John D. 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. Donald A. Soutar is an active member of the Bar of the Pennsylvania Supreme Court (ID: 84643) and has entered his appearance as counsel of record for Choice Energy in this matter pursuant to 52 Pa. Code § 1.24(b)(1).

2. John Coyle, Esq. is a Partner at the law firm of Coyle & Morris LLP, which is located at 201 Littleton Road, Suite 210, Morris Plains, NJ 07950, 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 Donald A. Soutar 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.

COYLE & MORRIS LLP

Date: April 21, 2023

s/ Donald A. Soutar

Donald A. Soutar
Attorney ID: 84643
201 Littleton Road, Ste, 210
Morris Plains, NJ 07950
973.370.0592 (Phone)
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Attorneys for Choice Energy LLC, d/b/a 4 Choice
Energy

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

I, Donald A. Soutar, state the following:

1. I am a member of good standing with the Bar of the Supreme Court of Pennsylvania (Attorney ID: 84643) and am acting as sponsor for the admission *pro hac vice* of John D. Coyle, Esq., to appear before the Pennsylvania Public Utility Commission in this matter.

2. I have known Mr. Coyle for more than a decade, and I believe him to be a reputable and competent attorney, and I am in a position to recommend Mr. Coyle for admission *pro hac vice*.

3. I am sponsoring Mr. Coyle's admission *pro hac vice* in this matter.

4. I am not acting as the sponsor for any other candidate before this Commission. I am acting as the sponsor for Dana L. Wefer, Esq., in connection with her appearance *pro hac vice* in a matter pending in the United States District Court for the Eastern District of Pennsylvania, entitled *Jim Kennedy v. PEI-Genesis*, Civil Action No. 2:23-164 (JDW).

5. 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.

7. The information required by Section 81.504 of the IOLTA regulations has been provided to the IOLTA Board and the fee required by Section 81.505(a) of the IOLTA regulations has been paid. Attached hereto as Exhibit A is a true copy of the fee payment certification from the IOLTA Board.

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. C.S. § 4904 (relating to falsifications to authorities).

COYLE & MORRIS LLP

Date: April 21, 2023

s/ Donald A. Soutar _____

Donald A. Soutar
Attorney ID: 84643
201 Littleton Road, Ste, 210
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Attorneys for Choice Energy LLC, d/b/a 4 Choice
Energy

Exhibit A

PA Interest on Lawyers Trust Account Board

[Return to the IOLTA PA Pro Hac Vice Website](#)

Thank you for your order!

You may print this receipt page for your records. A receipt has also been emailed to you.

Order Information

Merchant:	Pennsylvania Interest on Lawyers Trust Account Board		
Description:	Pro Hac Vice Application Fee		
Date/Time:	21-Apr-2023 13:10:51 EDT	Invoice	PHV20230421130921
Customer ID:	NJ029632001	Number:	

Billing Information

John Coyle
32 East Lake Boulevard
Morristown, NJ 07960
US
jcoyle@coylemorris.com
Phone: 9733703519

Total: \$377.75 (USD)

Payment Information

Date/Time:	21-Apr-2023 13:10:51 EDT
Transaction ID:	44067831875
Auth Code:	01552D
Payment Method:	Visa ****8476

Pursuant to 204 Pa Code §81.505.(a), no refunds will be issued under any circumstances. The total includes a \$2.75 convenience fee.

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

I, John D. 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 any disciplinary proceeding.

2. I have been granted admission *pro hac vice* in six other matters before the Commission: *Application of All Choice Energy MidAmerica LLC for approval to supply electricity or electric generation services as a supplier of electricity to the public in the service territories of PECO Energy Company and PPL Electrical Utilities Corporation* (Docket No.: A-2021-302456); *Application of All Choice Energy MidAmerica LLC for approval to supply natural gas services as a supplier or aggregator engaged in the business of supplying natural gas services in the service territories of PECO Energy Company and Philadelphia Gas Works and UGI Utilities* (Docket No.: A-2021-3024607); *Florence R. Parker Chaila v. Metropolitan Edison Company and Choice Energy, LLC, d/b/a/ 4 Choice Energy, LLC*, (Docket No. C-2021-3024417); *Henry Gorczycki v. Pennsylvania Electric Company and Choice Energy* (Docket No. C-2021-3027691); *Pamela M.*

Kennedy v. Choice Energy, LLC d/b/a 4 Choice Energy (Docket No. F-2021-3030023); and *Dr. Paul Kadjo v. Choice Energy, LLC and Metropolitan Edison Company* (Docket No. F-2022-3035101). I have not applied for *pro hac vice* admission in any other actions in Pennsylvania. As such, I have never been denied admission *pro hac vice* in any courts of record in Pennsylvania.

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 my appearance in this matter.

5. I consent to the appointment of the sponsoring attorney, Donald A. Soutar, 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.

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 & MORRIS LLP

Date: April 21, 2023



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RESPONDENT.

CERTIFICATE OF SERVICE

I, Donald A. Soutar, hereby certify that on April 21, 2023, I served copies of the foregoing *Choice Energy, LLC d/b/a 4 Choice Energy's Motion For Admission Pro Hac Vice Of John D. Coyle* as follows:

- 1) By filing same on the Pennsylvania PUC's eFiling system; and
- 2) By sending same, via priority mail, to:
Victoria Piotrowski
1668 W. Doe Run Road
Kennett Square, PA 19348

COYLE & MORRIS LLP

Date: April 21, 2022

s/ Donald A. Soutar

Donald A. Soutar
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Energy