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CINCINNATI, OHIO 45202

TELEPHONE (513) 421-2255

VIA eFILING

July 11, 2023

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

Re: In re: Application of Pennsylvania-American Water Company under Sections 1102(a) and 1329 of the Pennsylvania Public Utility Code, 66 Pa C.S. § § 1102(a) and 1329, approval of (1) the transfer, by sale, to Pennsylvania-American Water Company, of substantially all of the assets, properties and rights related to the wastewater collection and treatment system owned by the Butler Area Sewer Authority, (2) the rights of Pennsylvania-American Water Company to begin to offer or furnish wastewater service to the public in the City of Butler, and portions of the Borough of East Butler, and portions of the Townships of Butler, Center, Connoquenessing, Oakland, and Summit, in Butler County, Pennsylvania Docket # A-2022-3037047

Dear Secretary Chiavetta:

Attached please find Cleveland-Cliffs Steel's Motion for Admission Pro Hac Vice for filing in the above-captioned proceedings.

Copies will be served on all known parties in these proceedings, as indicated on the attached Certificate of Service.

Respectfully submitted,

/s/ Kurt J. Boehm

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

BOEHM, KURTZ & LOWRY

Sean M. Gallagher, Esq. (Pa.I.D. 318872)
GALLAGHER LAW GROUP

KJBkew

**COUNSEL FOR CLEVELAND-CLIFFS
STEEL**

result of a disciplinary charge, investigation, or proceeding from the practice of law in any jurisdiction, nor are any such disciplinary proceedings pending.

3. Mr. Boehm and Ms. Cohn agree to be bound by and comply with 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. Boehm and Ms. Cohn agree to submit to the jurisdiction of the Pennsylvania Courts and Pennsylvania Disciplinary Board with respect to acts and omissions occurring during their appearance in this matter.

4. Mr. Boehm and Ms. Cohn has consented to the appointment of Sean M. Gallagher, Esq. as their sponsor, who has filed his notice of appearance in this matter and who will remain counsel of record in this case on behalf of Cleveland-Cliffs, as required by the Pennsylvania Rules of Civil Procedure

5. Mr. Boehm and Ms. Cohn's Verified Statements for Admission Pro Hac Vice are attached.

WHEREFORE, I, Sean M. Gallagher, Esq., respectfully move for the admission of Kurt J. Boehm and Jody Kyler Cohn *pro hac vice*, on behalf of Cleveland-Cliffs Steel for all permissible purposes related to the above-referenced proceeding.

Respectfully submitted,

/s/ Sean M. Gallagher
Sean M. Gallagher, Esq. (Pa.I.D. 318872)
Gallagher law Group
110 East Diamond Street, Suite 101
Butler, PA 16001
Ph: 724.282.3141 Fax: 724.282.7378
Email: attys@gallagher.legal

July 11, 2023

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 Sean M. Gallagher, Esq. 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 these statements are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to falsification to authorities).

Respectfully submitted,

/s/ Kurt J. Boehm

Kurt. J. Boehm, Esq.

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July 11, 2023

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5. I consent to the appointment of the sponsoring attorney Sean M. Gallagher, Esq., 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 these statements are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to falsification to authorities).

Respectfully submitted,

/s/ Jody Kyler Cohn

Jody Kyler Cohn, Esq.

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July 11, 2023

CERTIFICATE OF SERVICE

I hereby certify that I have served a true copy of the foregoing Motion for Admission Pro Hac Vice of Cleveland-Cliffs Steel upon the parties listed below in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a party) via electronic mail this 11th day of July, 2023.

/s/ Kurt J. Boehm

Kurt J. Boehm, Esq.

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The Honorable Charles E. Rainey Jr.
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