

BOEHM, KURTZ & LOWRY
36 EAST SEVENTH STREET, SUITE 1510
CINCINNATI, OHIO 45202

TELEPHONE (513) 421-2255

VIA eFILING

December 6, 2023

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

Re: *Pennsylvania Public Utility Commission v. Pennsylvania-American Water Company, Docket Nos. R-2023-3043189 and R-2023-3043190*

Dear Secretary Chiavetta:

Attached please find the Motion for Admission Pro Hac Vice of Cleveland-Cliffs Steel 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

**COUNSEL FOR CLEVELAND-CLIFFS
STEEL**

KJBkew

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
vs.	:	Docket No. R-2023-3043189 (Water)
Pennsylvania American Water Company	:	R-2023-3043190 (Wastewater)

MOTION FOR ADMISSION PRO HAC VICE

Pursuant to Section 5.103 of the Pennsylvania Public Utility Commission’s (“Commission”) regulations, 52 Pa. Code § 5.103, and Rule 301(b) of the Pennsylvania Bar Admission Rules, I, Sean M. Gallagher, Esq., as counsel to Cleveland-Cliffs Steel (“Cleveland-Cliffs”) respectfully request that Your Honor enter an Order granting admission *pro hac vice* to Kurt J. Boehm and Jody Kyler Cohn , as counsel to Cleveland-Cliffs, for all purposes related to the above-referenced proceeding. In support of this Motion, I, Sean M. Gallagher, Esq. 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 Cleveland-Cliffs in this proceeding, and am an active member of the Bar of the Commonwealth of Pennsylvania (Pa.I.D. 318872).

2. Mr. Boehm and Ms. Cohn are licensed attorneys in good standing in Ohio and Kentucky. Mr. Boehm and Ms. Cohn have never been suspended, disbarred or resigned as a 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 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
Phone: 724-282-3141 Fax: 724-282-7378
Email: smgallagher@gallagher.legal

December 6, 2023

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
vs.	:	Docket No. R-2023-3043189 (Water)
Pennsylvania American Water Company	:	R-2023-3043190 (Wastewater)

**VERIFIED STATEMENT OF
KURT J. BOEHM FOR ADMISSION *PRO HAC VICE***

Pursuant to 52 Pa. Code §§ 1.22(b) and 5.103, Pa. B.A.R. 301 and Pa. R.C.P. 1012.1, Sean M. Gallagher, Esq., a member of the Bar of the Commonwealth of Pennsylvania (Pa. I.D. 318872), is moving for admission *pro hac vice* in the above-captioned proceeding. In support of the Motion, I submit this verified statement pursuant to Pa. R.C.P. 1012.1:

1. I am admitted to practice in and am a member of good standing in the Bar of Ohio and Kentucky.
2. I have never been suspended, disbarred or resigned as a result of a disciplinary charge, investigation, or proceeding from the practice of law in any jurisdiction, nor are any such disciplinary proceedings pending.
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 Professional 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 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.

BOEHM, KURTZ & LOWRY

36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: 513.421.2255 Fax: 513.421.2764

E-mail: kboehm@BKLawfirm.com

December 6, 2023

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission vs. Pennsylvania American Water Company	: : : : : : : : :	Docket No. R-2023-3043189 (Water) R-2023-3043190 (Wastewater)
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**VERIFIED STATEMENT OF
JODY KYLER COHN FOR ADMISSION *PRO HAC VICE***

Pursuant to 52 Pa. Code §§ 1.22(b) and 5.103, Pa. B.A.R. 301 and Pa. R.C.P. 1012.1, Sean M. Gallagher, Esq., a member of the Bar of the Commonwealth of Pennsylvania (Pa.I.D. 318872), is moving for admission *pro hac vice* in the above-captioned proceeding. In support of the Motion, I submit this verified statement pursuant to Pa. R.C.P. 1012.1:

1. I am admitted to practice in and am a member of good standing in the Bar of Ohio and Kentucky.
2. I have never been suspended, disbarred or resigned as a result of a disciplinary charge, investigation, or proceeding from the practice of law in any jurisdiction, nor are any such disciplinary proceedings pending.
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 Professional 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 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.

BOEHM, KURTZ & LOWRY

36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: 513.421.2255 Fax: 513.421.2764

E-mail: jkylercohn@BKLawfirm.com

December 6, 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 6th day of December, 2023.

/s/ Kurt J. Boehm

Kurt J. Boehm, Esq.

Kenneth M. Kulak, Esq.
Brooke E. McGlinn, Esq.
Catherine Vasudevan, Esq.
Mark A. Lazaroff, Esq.
Morgan, Lewis & Bockius LLP
ken.kulak@morganlewis.com
brooke.mcglinn@morganlewis.com
catherine.vasudevan@morganlewis.com
mark.lazaroff@morganlewis.com

Elizabeth Rose Triscari, Esq.
Teresa K. Harrold, Esq.
Erin K. Fure, Esq.
Pennsylvania-American Water Company
elizabeth.triscari@amwater.com
teresa.harrold@amwater.com
erin.fure@amwater.com

Elizabeth Rose Triscari, Esq.
Teresa K. Harrold, Esq.
Erin K. Fure, Esq.
Pennsylvania-American Water Company
852 Wesley Drive
Mechanicsburg, PA 17055
elizabeth.triscari@amwater.com
teresa.harrold@amwater.com
erin.fure@amwater.com

Steven C. Gray, Esq.
Rebecca Lyttle, Esq.
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101
sgray@pa.gov
relyttle@pa.gov

Andrew J. Zerby, Esq.
Melanie El Atieh, Esq.
David T. Evrard, Esq.
Erin L. Gannon, Esq.
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
azerby@paoca.org
melatieh@paoca.org
devrard@paoca.org
egannon@paoca.org

Carrie B. Wright, Esquire
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
carwright@pa.gov

Ria M. Pereira, Esq.,
Lauren N. Berman, Esq.,
John W. Sweet, Esq.,
Elizabeth R. Marx, Esq.
118 Locust Street
Harrisburg, PA 17101
pulp@pautilitylawproject.org