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December 12, 2024

VIA ELECTRONIC FILING

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

RE: LORIN AND JAMI DEGROAT v. nTHERM, LLC
Docket No. C-2024-3052230

Dear Secretary Chiavetta:

Enclosed for filing please find a Motion for the Admission of Natara Feller *Pro Hac Vice* on behalf of nTherm, LLC, in the above-captioned matter. A copy has been served in accordance with the enclosed Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Respectfully submitted,

STEVENS & LEE



Michael A. Gruin

Enclosure

cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

LORIN AND JAMI DEGROAT :
v. : Dkt. No. C- 2024-3052230
nTHERM, LLC :
: :
: :

VERIFIED STATEMENT OF NATARA FELLER

Pursuant to 52 Pa. Code §§ 1.22(b) and 5.103 and Pa. B.A.R. 301 and 1012.1, Michael A. Gruin, Esquire, a member of the Bar of the Commonwealth of Pennsylvania (Attorney I.D. No. 78625), moves for my admission *pro hac vice* in the above-captioned proceedings. In support of Mr. Gruin’s Sponsor Motion and pursuant to Pa. B.A.R. 1012.1, I, Natara Feller candidate, submit this verification and hereby state as follows:

1. I am a member in good standing of the State Bars of New York (Bar No. 728957) New Jersey (Bar No. 032062005) and the District of Columbia (Bar No. 982179).
2. I am an experienced attorney with extensive knowledge of issues related to electric generation and natural gas suppliers.
3. I practice with the law firm of Feller Law Group in Brooklyn, New York.
4. I have not been denied admission to, been disciplined by, resigned from, surrendered my license to practice before, or withdrawn an application for admission to practice, nor do I currently have, nor have I ever had, any disciplinary proceedings pending against me in any Federal or State Court or Administrative Agency, nor have I ever been reprimanded,

suspended, or disbarred from the practice of law. I have no pending disciplinary complaints as to which a finding has been made that the complaint should proceed to a hearing.

5. I have previously been admitted pro hac vice in the following matters before the Pennsylvania Public Utility Commission: *Erie Indemnity Co. v. nTherm, LLC*, Docket No. C-2022-3036531, *Melvin Smith v. Rushmore Energy, LLC*, Docket No. F-2024-3051171.

6. My pro hac vice application is pending before the Pennsylvania Public Utility Commission in *Alin Hospitality LLC v. FirstEnergy Pennsylvania Electric Company and nTherm LLC*, Docket No. C-2024-3050928.

7. I will comply with and be bound by all applicable statutes, case law and procedural rules of the Commonwealth of Pennsylvania, including the Pennsylvania Rules of Professional Conduct, and I will submit to the jurisdiction of the Commonwealth of Pennsylvania courts, administrative agencies and the Disciplinary Board with respect to the acts and omissions occurring during the appearance in the matter for which *pro hac vice* is being sought.

8. I consent to the appointment of Michael A. Gruin, and the law firm of Stevens & Lee 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 matters for which admission *pro hac vice* is sought.

9. If there should be any proceeds from the settlement of this proceeding in which I am admitted *pro hac vice*, they shall be received, held, and distributed and accounted for in accordance with Rule 1.15 of the Pennsylvania Rules of Professional Conduct, including the IOLTA provisions thereof, if applicable.

10. In support of this motion, Michael A. Gruin, Esq., attaches a Verification labelled as Exhibit B, which satisfies the requirements of the foregoing Rule of Civil Procedure.

11. I verify that the foregoing statement is true to the best of my knowledge, information and belief. I understand that the statements are made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsification to authorities.

WHEREFORE, I respectfully request admission as counsel for nTherm, LLC in the above captioned action.

Respectfully submitted,

Dated: December 12, 2024

/s/ Natara Feller
Natara Feller
Managing Partner
Feller Law Group, PLLC
159 20th St. Suite 1B
Brooklyn, NY 11232
natarafeller@feller.law
(212) 590-0145

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

LORIN AND JAMI DEGROAT :
v. : Dkt. No. C- 2024-3052230
nTHERM, LLC :
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VERIFIED STATEMENT OF MICHAEL A. GRUIN

I, Michael A. Gruin, hereby state as follows:

1. I am admitted to practice law in the Commonwealth of Pennsylvania and am a member in good standing holding Bar No. 78625. I have never been suspended, disbarred, or disciplined by a court or administrative agency, nor am I subject to any proceeding for suspension, disbarment, or disciplinary action.

2. I regularly practice before the Pennsylvania Public Utility Commission.

3. Natara Feller is an attorney duly licensed in the State Bars of New York (Bar No. 728957) New Jersey (Bar No. 032062005) and the District of Columbia (Bar No. 982179). Ms.

Feller’s address, telephone number, fax number, and email address are as follows:

Natara Feller
Feller Law Group, PLLC
159 20th St. 1B
Brooklyn, NY 11232
212-590-0145
natarafeller@feller.law

4. Ms. Feller is not now, and has never been, under any order of discipline by any disciplinary board and presently is a member of good standing of the Bars of New York, New Jersey and Washington, D.C.

5. Ms. Feller is of good moral and professional character and, if required, will swear and affirm that she will demean herself as an attorney and counselor of this Court, uprightly and according to the law, and that she will support the Constitution of the United States.

6. After reasonable investigation, I believe Ms. Feller to be a reputable and competent attorney, and I am in a position to recommend her admission.

7. The proceeds from the settlement of a cause of action in which Ms. Feller is admitted *pro hac vice* shall be received, held, and distributed and accounted for in accordance with Rule 1.15 of the Pennsylvania Rules of Professional Conduct, including the IOLTA provisions thereof, if applicable.

WHEREFORE, it is respectfully requested that Ms. Feller be permitted to practice *pro hac vice* before the Pennsylvania Public Utility Commission in this proceeding.

Respectfully submitted,



Dated: December 12, 2024

Michael A. Gruin, (I.D. No. 78625)
STEVENS & LEE
17 N. 2nd St., 16th Fl.
Harrisburg, PA 17101
Tel. (717) 255-7365
Fax (610) 988-0852

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

LORIN AND JAMI DEGROAT

v.

nTHERM, LLC

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Dkt. No. C- 2024-3052230

**ORDER GRANTING MOTION FOR ADMISSION
PRO HAC VICE OF NATARA FELLER**

Upon consideration of the Motion for Admission *Pro Hac Vice* of Natara Feller, it is this
___ day of December, 2024,

ORDERED, that the Motion is hereby GRANTED, and it is further

ORDERED, that Natara Feller is admitted *pro hac vice* for the purposes of representing
nTherm, LLC in the above-captioned proceedings.

Honorable _____
Administrative Law Judge

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

LORIN AND JAMI DEGROAT
v.
nTHERM, LLC

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: Dkt. No. C- 2024-3052230
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CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of December, 2024, a copy of the foregoing Motion for Admission *Pro Hac Vice* has been served, via electronic mail, upon the persons listed below, in accordance with the Requirements of 52 Pa. Code § 1.54:

Lorin A. DeGroat
Jami S. DeGroat
Casey's Restaurant
630 North Seneca Street
Oil City, PA 16301
jami40degroat@gmail.com



Michael A. Gruin

DATED: December 12, 2024