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February 28, 2025

VIA ELECTRONIC FILING

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

Re: Docket Nos. A-2024-3051925 *et al.*

Dear Secretary Chiavetta:

Enclosed for filing on behalf of Verizon Communications Inc. is the Motion for Admission Pro Hac Vice of Morgan Schick.

Should you have any questions or need additional information, please contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Michael B. Hazzard'.

Michael B. Hazzard

Counsel to Verizon Communications Inc.

Attachments

VIA EMAIL

cc: Attached Certificate of Service

CERTIFICATE OF SERVICE

I, Michael B. Hazzard, hereby certify that I have this day served a copy of Verizon's Motion for Admission Pro Hac Vice of Morgan Schick, upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (related to service by a participant) and 1.55 (related to service upon attorneys).

Dated at Washington, DC, this 28th day of February, 2025.

VIA EMAIL

The Honorable Steven Haas
The Honorable Erin L. Gannon
Administrative Law Judge
Pennsylvania Public Utility Commission
400 North Street
Commonwealth Keystone Building
Harrisburg, PA 17120
sthaas@pa.gov
egannon@pa.gov

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joyce.carwin@FTR.com



Michael B. Hazzard
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Washington, DC 20004
(202) 799-4560
Counsel to Verizon Communications Inc.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

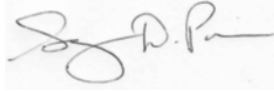
Joint Application of:	:	
	:	
Frontier Communications Parent, Inc.,	:	
Commonwealth Telephone Enterprises LLC,	:	
Commonwealth Telephone Company	:	Docket Nos. A-2024-3051925
LLC d/b/a Frontier Communications	:	A-2024-3051926
Commonwealth Telephone Company,	:	A-2024-3051927
Frontier Communications of Breezewood, LLC	:	A-2024-3051929
Frontier Communications of Canton, LLC	:	A-2024-3051931
Frontier Communications of Lakewood, LLC,	:	A-2024-3051932
Frontier Communications of Oswayo River LLC,	:	A-2024-3051933
Frontier Communications of Pennsylvania, LLC,	:	A-2024-3051934
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CTSI, LLC,	:	
CTE Telecom, LLC, d/b/a Frontier	:	
Communications CTE Telecom Company,	:	
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	:	
And	:	
	:	
Verizon Communications Inc.,	:	
France Merger Sub Inc.,	:	
	:	
For any Approvals Required Under	:	
the Public Utility Code for a Transfer	:	
of Control of Frontier Communications	:	
Parent, Inc. and its Pennsylvania subsidiaries to	:	
Verizon Communications Inc.	:	

NOTICE TO PLEAD

TO: Counsel of Record

You are hereby notified that Verizon Pennsylvania LLC (“Verizon”) has filed pursuant to 52 Pa. Code § 5.103(a) and §1.22(b), a Motion for Admission *Pro Hac Vice* in the above-captioned proceeding. You may submit a response to the Motion within twenty (20) days pursuant to 52 Pa.

Code § 5.103(c). If no response is submitted, the presiding officer may rule on the Motion without a response from you, thereby requiring no other proof. All Pleadings, such as a response to the Motion, must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served on the undersigned counsel for Verizon.



Suzan D. Paiva (Atty ID No. 53853)
Verizon
900 Race St., 6th Floor
Philadelphia, PA 19107
Telephone: 267-768-6184

Suzan.D.Paiva@verizon.com

Attorney for Verizon Communications Inc.

Dated: February 28, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Application of:	:	
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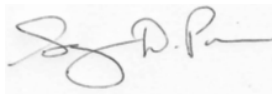
**MOTION FOR ADMISSION *PRO HAC VICE* OF
MORGAN SCHICK ON BEHALF OF VERIZON
COMMUNICATIONS INC.**

I, Suzan D. Paiva, an attorney in good standing and authorized to practice in the Commonwealth of Pennsylvania, hereby move the Pennsylvania Public Utility Commission, in accordance with 52 Pa. Code § 1.22(b) and the Pennsylvania Bar Admission Rules, 204 Pa. Code Rule 301, to permit Morgan Schick, a member of the North Carolina State Bar (Bar ID No.

56591) and District of Columbia Bar (Bar ID No. 1740803), to appear *pro hac vice* in the above captioned matter on behalf of Verizon Communications Inc. (“Verizon”). The Verified Statement of Suzan D. Paiva is attached to and relied upon in support of this Motion.

I hereby certify that copies of this motion and the attached Verified Statements have been served upon all parties of record in the above-captioned matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Suzan D. Paiva', is positioned above a horizontal line.

Suzan D. Paiva (Atty ID No. 53853)
Verizon
900 Race St., 6th Floor
Philadelphia, PA 19107
Telephone: 267-768-6184

Suzan.D.Paiva@verizon.com

Attorney for Verizon Communications Inc.

Dated: February 28, 2025

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PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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VERIFIED STATEMENT OF SUZAN D. PAIVA

I, Suzan D. Paiva, hereby state as follows:

1. I am Associate General Counsel for Verizon in the State of Pennsylvania.
2. I am admitted to practice law in the Commonwealth of Pennsylvania and am in good standing with all courts and administrative agencies of the Commonwealth.
3. I regularly practice before the Pennsylvania Public Utility Commission.

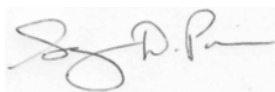
4. I have never been suspended, disbarred or disciplined by any court or administrative agency, nor am I subject to any proceeding for suspension, disbarment or disciplinary action.

5. After reasonable investigation, I reasonably believe Morgan Schick, the candidate for admission *pro hac vice* before the Pennsylvania Public Utility Commission, to be a reputable and competent attorney.

6. I am in a position to recommend the admission *pro hac vice* of Morgan Schick.

7. If there should be any proceeds from the settlement of this proceeding, such proceeds 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, if applicable.

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



Suzan D. Paiva (Atty ID No. 53853)
Verizon
900 Race St., 6th Floor
Philadelphia, PA 19107
Telephone: 267-768-6184

Suzan.D.Paiva@verizon.com

Attorney for Verizon Communications Inc.

Dated: February 28, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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VERIFIED STATEMENT OF MORGAN SCHICK

Pursuant to 52 Pa. Code §§ 1.22(b) and 5.103 and Pa. B.A.R. 301 and 1012.1, Suzan D. Paiva, Esquire, a member of the Bar of the Commonwealth of Pennsylvania (Attorney ID No. 53853), is moving for my admission *pro hac vice* in the above-captioned proceeding. In support of said sponsor's motion, I, the candidate, Morgan Schick, submit this verification, pursuant to Rule 1012.1:

1. I am admitted to practice and am a member in good standing of the North Carolina State Bar (Bar ID No. 56591) and District of Columbia Bar (Bar ID No. 1740803).

2. I have never been suspended, disbarred or otherwise disciplined, nor am I currently the subject of any disciplinary proceeding.

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, and shall submit to the jurisdiction of the Pennsylvania courts and the Pennsylvania Disciplinary Board with respect to the acts and omissions occurring during the appearance in the matter for which *pro hac vice* is being sought.

4. I do consent to the appointment of the sponsoring attorney, Suzan D. Paiva, Esquire, 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.

5. If there should be any proceeds from the settlement of this proceeding, such proceeds 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.

6. I verify that the foregoing statements are 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.

Morgan Schick

Morgan Schick
DLA Piper
500 Eighth Street, NW
Washington, DC 20004
(202) 799-4550
morgan.schick@us.dlapiper.com.com

Dated: February 28, 2025

Counsel for Verizon Communications Inc.

**BEFORE THE
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**ORDER GRANTING MOTION FOR ADMISSION
PRO HAC VICE OF MORGAN SCHICK**

Upon consideration of the Motion for Admission *Pro Hac Vice* of Morgan Schick, it is
this ____ of March, 2025

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

ORDERED that Morgan Schick is admitted *pro hac vice* for the purposes of representing Verizon Communications Inc. in the above-captioned action.
