



May 8, 2025

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

RE: C-2024-3050663, C-2024-3050779, C-2024-3050912, C-2024-3050923,
C-2024-3050949, C-2024-3050976, C-2024-3050975, C-2024-3050985, C-2024-3050979,
C-2024-3051002 v PECO Energy company (Dkt. No. C-2024-3050663)

Dear Secretary Chiavetta:

Enclosed please find the Motion for Admission of Robert E. Barnes Pro Hac Vice in the above-captioned matters. Copies have been served in accordance with the attached Certificate of Service.

Should you have any questions or concerns, please do not hesitate to contact me.

Best Regards,

/s/ Bradford Geyer

Bradford L. Geyer

PA 62998

NJ 022751991

Suite 141 Route 130 S., 303

Cinnaminson, NJ 08077

Brad@FormerFedsGroup.Com

(856) 607-5708

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

C-2024-3050663, C-2024-3050779,
C-2024-3050912, C-2024-3050923,
C-2024-3050949, C-2024-3050976,
C-2024-3050975, C-2024-3050985,
C-2024-3050979, C-2024-3051002 v
PECO Energy company

MOTION FOR ADMISSION PRO HAC VICE OF ROBERT E. BARNES

Pursuant to Rule 301 of the Pennsylvania Rules of Admission, Bradford L. Geyer, an active member and a member in good standing of the bar of this Commonwealth (Attorney I.D. No. 62998) moves for the admission pro hac vice of Robert E. Barnes, Esq., to appear on behalf of several Plaintiffs in this consolidated proceeding.

1. In support of this motion, a Verified Statement of Robert E. Barnes, Esq., is attached hereto.

2. The candidate is a member of good standing of the jurisdictions attached hereto and he has never been suspended, disbarred or otherwise disciplined by any court or administrative body.

WHEREFORE, the undersigned respectfully moves that Robert E. Barnes, Esq., be admitted to appear pro hac vice on behalf of the Plaintiffs in this proceeding

DATED: April 8, 2025

Respectfully submitted,

BY: /s/ Bradford Geyer
Bradford L. Geyer
PA 62998
NJ 022751991
Suite 141 Route 130 S., 303
Cinnaminson, NJ 08077
Brad@FormerFedsGroup.Com
(856) 607-5708

COMMONWEALTH OF PENNSYLVANIA
PUBLIC UTILITY COMMISSION

C-2024-3050663, C-2024-3050779,
C-2024-3050912, C-2024-3050923,
C-2024-3050949, C-2024-3050976,
C-2024-3050975, C-2024-3050985,
C-2024-3050979, C-2024-3051002 v
PECO Energy company

VERIFICATION

I, Robert E. Barnes, state the following:

1. I am a member of good standing in California (Bar No. 235919), Tennessee (Bar No. 020617) and Wisconsin (Bar No. 1038252). Certificates of good standing are attached. (Exhibits 1-3)
2. I do not currently have, nor have I ever had, any disciplinary action pending against me in any federal or state court, nor have I ever been reprimanded, suspended or disbarred from the practice of law.
3. I have previously applied for admission pro hac vice in matters before state courts in Pennsylvania, which were granted and remain in effect and good standing.
4. 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.
5. 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 the matter for which pro hac vice is being sought.
6. I consent to the appointment of the sponsoring attorney, Bradford L. Geyer, 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.
7. 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).

Robert E. Barnes Admissions Chart

<u>Title of Court</u>	<u>Date of Admission</u>
Wisconsin Supreme Court (currently in fee dispute)	7-26-01
Tennessee Supreme Court	1-25-02
Eastern District of Wisconsin	9-29-03
Seventh Circuit Court of Appeals	approximately 4-8-04
Ninth Circuit Court of Appeals	4-14-04
U.S. Tax Court	4-21-04
Fifth Circuit Court of Appeals	4-23-04
Tenth Circuit Court of Appeals	5-10-04
California Supreme Court	4-04-05
Southern District of California	approximately July 2005
Central District of California	approximately Apr. 2006
Northern District of California	approximately Sep. 2006
First Circuit Court of Appeals	5-15-07
Northern District of Florida	8-12-08
Eleventh Circuit Court of Appeals	1-28-11
U.S. Supreme Court	
U.S. District Court for the District of Columbia	September 6, 2022

Exhibit 1



BOARD OF PROFESSIONAL RESPONSIBILITY
of the
SUPREME COURT OF TENNESSEE

SANDY L. GARRETT
CHIEF DISCIPLINARY COUNSEL
STEVEN J. CHRISTOPHER
DEPUTY CHIEF DISCIPLINARY COUNSEL INVESTIGATIONS
A. RUSSELL WILLIS
DEPUTY CHIEF DISCIPLINARY COUNSEL LITIGATION
LAURA L. CHASTAIN
ETHICS COUNSEL
BEVERLY P. SHARPE
DIRECTOR OF CONSUMER ASSISTANCE

10 CADILLAC DRIVE, SUITE 220
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(615) 361-7500
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DOUGLAS R. BERGERON
SHILINA B. BROWN
ANDREW B. CAMPBELL
ERIC A. FULLER
JAMES W. MILAM
DIANE M. NISBET
EILEEN BURKHALTER SMITH
DISCIPLINARY COUNSEL

July 22, 2022

Mr. Robert E. Barnes
3030 Liberty Cir S
Las Vegas, NV 89121-1360

Re: Robert E. Barnes
BPR No. 020617

TO WHOM IT MAY CONCERN:

On December 18, 1975, the Tennessee Supreme Court established the Board of Professional Responsibility of the Supreme Court of Tennessee to supervise the conduct of attorneys licensed to practice law in this state.

The records of the Board of Professional Responsibility indicate that the attorney referenced above was licensed in Tennessee to practice law and sworn in on 1/25/2002. The attorney's license is currently Active and is in good standing.

Sincerely,

A handwritten signature in cursive script that reads "Mary McKnight".

Mary McKnight
Registration Manager

MLM/lw

Exhibit 2



Sheila T. Reiff
Clerk

**WISCONSIN SUPREME COURT
OFFICE OF THE CLERK**

110 E. Main Street, Suite 215
P.O. Box 1688
Madison, WI 53701-1688

Telephone: 608-266-1880
TTY: 800-947-3529
Fax: 608-267-0640
<http://www.wicourts.gov>

CERTIFICATE OF GOOD STANDING

I, Sheila T. Reiff, Clerk of the Supreme Court of Wisconsin certify that the records of this office show that:

ROBERT E. BARNES

was admitted to practice as an attorney within this state on July 26, 2001 and is presently in good standing in this court.

Dated: July 8, 2022


SHEILA T. REIFF
Clerk of Supreme Court



Exhibit 3



BOARD OF PROFESSIONAL RESPONSIBILITY
of the
SUPREME COURT OF TENNESSEE

SANDY L. GARRETT
CHIEF DISCIPLINARY COUNSEL
STEVEN J. CHRISTOPHER
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Sincerely,

A handwritten signature in cursive script that reads "Mary McKnight".

Mary McKnight
Registration Manager

MLM/lw

CERTIFICATE OF SERVICE

I certify that the following were served on May 8, 2025 to the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code § 1.54.

Via email only:

Khadijah Scott, Esq.
PECO Energy Company
2301 Market Street
Philadelphia, PA 19103
Email: khadijah.scott@exeloncorp.com

Teri-Lee Rhoades
Mediator/Attorney
Office of Administrative Law Judge
Phone: 717-787-5633
Email: terhoades@pa.gov

DATED: May 8, 2025

Respectfully submitted,

BY: /s/ Robert Barnes
Robert Barnes
BARNES LAW
700 South Flower Street, Suite 1000
Los Angeles, California 90017
Telephone: (310) 510 -6211
Facsimile: (310) 510-6225
Email: robertbarnes@barneslawllp.com