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May 29, 2025

**VIA E-FILING**

Matthew Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, Second Floor  
Harrisburg, PA 17120

**RE: Complaints against PECO Energy Company's Reliability in Solebury Township  
Docket Nos. 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**

Dear Mr. Homsher:

Enclosed for filing with the Commission is the *Objection of PECO Energy Company to Motion to Admit Counsel, Robert E. Barnes PRO HAC VICE*.

I have enclosed a Certificate of Service showing that a copy of the above document was served on the interested parties. Thank you for your time and attention on this matter.

Very truly yours,

A handwritten signature in blue ink that reads "Khadijah Scott".

Khadijah Scott, Esquire  
Assistant General Counsel, PECO Energy Company

Encl.

Cc: Honorable John Coogan, ALJ (w/encl via email)  
Teri-Lee Rhoades (w/encl via email))



time, someone identifying themselves as Tim Omarza joined the call stating that he was a paralegal for Robert Barnes, Esquire, who was unavailable. He further advised that he would file an Entry of Appearance for the Complainants. On January 22, 2025, an entry of appearance for Robert Barnes was not filed. Instead, an entry of appearance was filed on behalf of purported paralegal, Tim Omarza. Inasmuch as the entry of appearance was an improper attempt at the unauthorized practice of law, the entry was stricken on May 1, 2025. On May 8, 2025, a Motion Pro Hac Vice (“Motion”), was filed by Robert Barnes, Esquire.

Pursuant to 231 Pa. Code 1012.1. Admission Pro Hac Vice. Motion. Content., the Motion of Robert E. Barnes, Esquire, fails to provide the required parameters for acceptance of a Motion Pro Hac Vice. As an elementary issue, the Motion fails to even identify who Mr. Barnes purports to represent. Moreover, the sponsor, Bradford Geyer, Esquire, has not “entered an appearance as attorney of record in the action on behalf of the party whom the candidate seeks to represent,” failing to comply with section 231 Pa. Code 1012.1(d)(1). It is also important to note that none of the ten Complainants have identified Mr. Barnes as their counsel. Moreover, several have specifically communicated to PECO that he is not associated with their case or their representation, which makes Mr. Barnes Motion, questionable at best.

Furthermore, pursuant to 231 Pa. Code 1012.1 (b)(1):

(b)(1) The sponsor shall file a written motion for admission *pro hac vice* in the action for which admission is sought. (i) aver that the information required by Section 81.504 of the IOLTA regulations has been provided to the IOLTA Board, and (ii) either aver that the fee required by Section 81.505(a) of the IOLTA regulations has been paid, include as an attachment a copy of a fee payment certification from the IOLTA Board, or aver that the payment of the fee is not required pursuant to Section 81.505(c) of the IOLTA regulations.

The Motion has failed to comply.

Pursuant to 231 Pa. Code 1012.1 (c)(1):

A candidate shall submit a verified statement

- (1) identifying the jurisdictions in which he or she is or has been licensed and the corresponding bar license numbers.

The motion has failed to comply as no bar license number is identified for the purported state bar admissions to the Northern District of Florida.

Pursuant to 231 Pa. Code 1012.1(2):

- (2) setting forth the number of pending actions in all courts of record in Pennsylvania in which the candidate has applied for admission *pro hac vice*, and the number of actions in which the motion has been denied.

The Motion has failed to comply.

Pursuant to 231 Pa. Code 1012.1(2):

- (2) The sponsor shall submit a verified statement
  - (i) stating that after reasonable investigation, he or she reasonably believes the candidate to be a reputable and competent attorney and is in a position to recommend the candidate's admission,
  - (ii) setting forth the number of cases in all courts of record in this Commonwealth in which he or she is acting as the sponsor of a candidate for admission *pro hac vice*, and
  - (iii) stating that the proceeds from the settlement of a cause of action in which the candidate is granted admission *pro hac vice* shall be received, held, distributed and accounted for in accordance with Rule 1.15 of the Pennsylvania Rules of Professional Conduct, including the IOLTA provisions thereof, if applicable.

The Motion has failed to comply.

**Conclusion**

Counsel, Robert Barnes, Esquire, has failed to demonstrate the required elements of a Motion to Admit Counsel *Pro Hac Vice* in Pennsylvania. The Motion has failed to comply with basic Pennsylvania law. PECO therefore respectfully requests that Your Honor deny this Motion.



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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**In re: Complaints Against PECO Energy :**  
**Company’s Reliability in Solebury :**  
**Township :**  
**DOCKET NO. C-2024-3050663**  
**DOCKET NO. C-2024-3050779**  
**DOCKET NO. C-2024-3050912**  
**DOCKET NO. C-2024-3050923**  
**DOCKET NO. C-2024-3050949**  
**DOCKET NO. C-2024-3050976**  
**DOCKET NO. C-2024-3050975**  
**DOCKET NO. C-2024-3050985**  
**DOCKET NO. C-2024-3050979**  
**DOCKET NO. C-2024-3051002**

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of PECO Energy Company's Motion to Consolidate in the above matter upon all interested parties by *E-mailing* a copy thereof, properly to:

Robert Barnes, Esq. Barnes Law 700 South Flower Street Suite 1000 Los Angeles, CA 90017 <a href="mailto:robertbarnes@barneslawllp.com">robertbarnes@barneslawllp.com</a>	Bradford L. Geyer, Esq. Former Feds Group Suite 141, Route 130, S. 303 Cinnaminson, NJ 08077 <a href="mailto:Brad@FormerFedsGroup.Com">Brad@FormerFedsGroup.Com</a>
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Dated: May 29, 2025




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