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June 5, 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 Reply to Peco Energy Company's
Objection to Motion to Admit 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,
Robert E. Barnes, Esquire
Barnes Law LLP

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

**COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Complainants:

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,
Respondent.

Docket No.: C-2024-3050663

**REPLY TO PECO ENERGY COMPANY'S OBJECTION TO
MOTION TO ADMIT ROBERT E. BARNES PRO HAC VICE**

Complainants Marc Blucas, Valerie Patterson and Timothy Guiner respectfully submit this Reply in response to PECO Energy Company's Objection to the Motion to Admit Robert E. Barnes Pro Hac Vice. In support thereof, Complainants state as follows:

The Motion to Admit Robert E. Barnes Pro Hac Vice was filed in accordance with 52 Pa. Code § 1.22(b) and includes all necessary certifications and statements required under Pennsylvania law and PUC procedure.

Mr. Barnes is a member in good standing of the State Bar of California, Tennessee and Wisconsin and has previously been admitted pro hac vice before Pennsylvania tribunals, including both federal and state proceedings.

The objection raises no meritorious procedural or substantive grounds to deny admission. No evidence is presented that Mr. Barnes is unfit, unethical, or poses any disruption to the integrity of the Commission's proceedings.

Mr. Barnes will be working in conjunction with Pennsylvania-licensed counsel, Bradford L. Geyer, who will enter an appearance in this matter.

Provided below are point-by-point responses to the objections raised by PECO:

- Barnes Law represents complainants Marc Blucas, Valerie Patterson and Timothy Guiner.

- Payment of a pro hac vice fee to the Pennsylvania Interest on Lawyers' Trust Accounts Board (PA IOLTA) is not required. See question 7 of the Frequently Asked Questions section of PA IOLTA's website:

Is a payment form and admission fee required for state agency appearances or appearances as counsel in depositions or other situations in which an attorney will not enter an appearance before a Pennsylvania court?

No. The rule does not apply to administrative agency proceedings, cases in federal courts located in Pennsylvania, or situations not involving the entry of an appearance before a Pennsylvania court.

- Pennsylvania cases in which Robert E. Barnes has been admitted pro hac vice:

State Court:

- In the Matter of the State Board of Veterinary Medicine Investigative Subpoena Duces Tecum at BPOA Case Nos. 20-57-002388, 20-57-002391, & 20-57-002557
- 24-00528 Pennsylvania Department of Agriculture v. Amos Miller, et al
- CI-24-00528 Commonwealth of Pennsylvania Department of Agriculture v. Amos Miller
- 2859 EDA 2024 Com. v. Maggitti, U.
- CP-36-CR-0002264-2024 Comm. v. Stoltzfus, John S. Jr.
- CP-36-CR-0004440-2024 Comm. v. Stoltzfus, Aaron E
- 58 MM 2024 McKnight, A. & L., h/w, Pets v. PUC

Federal Court

- Winans v. Cox Automotive, Inc. U.S. District Court for the Eastern District of Pennsylvania Date of Admission: April 2023
- United States v. Miller's Organic Farm Court: U.S. District Court for the Eastern District of Pennsylvania Case No.: 5:19-cv-01435 Date of Admission: September 2021
- There have been no instances in which a judge has denied pro hac vice to Barnes in Pennsylvania.
- The submitted pro hac vice application does not state that Mr. Barnes is a member of the Florida bar. The application states that he's a member in good standing of the state bar in California, Wisconsin and Tennessee. In 2008 Barnes did defend

Hollywood actor Wesley Snipes in federal court in Ocala, Florida in a high-profile income tax evasion case.

In closing, Mediator/Attorney Teri-Lee Rhoades allowed paralegal Tim Omarzu to participate in the Jan. 16, 2025, virtual Mediation Question and Answer session after Omarzu explained to her (in writing in an email sent about five hours before the meeting; see attached) that he is a paralegal.

Also, PECO attorney Khadijah Scott verbally agreed to let Omarzu sit in on the meeting once it had started.

WHEREFORE, Complainants respectfully request that the Commission deny PECO Energy Company's Objection and grant the Motion to Admit Robert E. Barnes Pro Hac Vice.

Respectfully submitted,

s/Robert E. Barnes

Robert E. Barnes

DATED: June 5, 2025



Tim Omarzu <timomarzu@barneslawllp.com>

Re: TODAY Q&A for the Consolidated Solebury/New Hope cases v. PECO.

Tim Omarzu <timomarzu@barneslawllp.com>
To: "Rhoades, Teri-Lee" <terhoades@pa.gov>

Thu, Jan 16, 2025 at 11:29 AM

Hi Ms. Rhoades,
One clarification: I'm a researcher/paralegal. And a question: Do you know what docket number I should type into PacFile? I'm trying to look by agency (the Pa. PUC), and that's not working. It's forcing me to select a court.

ACFile® - Case Search

Select a search type from the dropdown (default search type is by Docket Number)

Search Type: Agency
Agency: Public Utility Commissions
Court Type: Appellate Court
Court: Commonwealth Court of Pennsylvania
District: Philadelphia
Docket Type: Active
Case Status: Active
Date Filed Start Date: mm/dd/yyyy
Date Filed End Date: mm/dd/yyyy
[Search] [Clear]

Case Information	Short Caption	Filing Date	Court	Case Status	Lead Case	View
22-03-2024	MARSHALL P v PUC	08/02/2024	COMMONWEALTH COURT OF PENNSYLVANIA	Active		
02-03-2024	RAUL B v PUC	02/02/2024	COMMONWEALTH COURT OF PENNSYLVANIA	Active		

On Thu, Jan 16, 2025 at 10:29 AM Rhoades, Teri-Lee <terhoades@pa.gov> wrote:

Parties,

Here are reminders for you regarding the Q&A Mediation Session TODAY starting at 4:00 p.m. with a potential stop at 5:00 p.m.

Additionally, Attorney Tim Omarzu has requested to listen in on behalf of some of the Complainants. Until Attorney Omarzu enters an appearance his participation will be allowed only if all parties agree. However,

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing Reply to PECO Energy Company's Objection to Motion to Admit Robert E. Barnes Pro Hac Vice upon the persons listed below in accordance with the requirements of 52 Pa. Code § 1.54:

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Dated: June 5, 2025
Respectfully submitted,

/s/ Robert Barnes

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