

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

WALTER FEY

v.

RUSHMORE ENERGY, LLC

:
:
: Docket No. C-2025-3057209
:
:

NOTICE TO PLEAD

TO: Walter Fey
1719 Standwood Street
Philadelphia, PA 19152
Email: waltfey25262@outlook.com

Pursuant to 52 Pa. Code §5.103(b), you are hereby notified that, if you have 20 days to file a written response to the enclosed MOTION FOR ADMISSION PRO HAC VICE. All responses must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served to counsel for Rushmore Energy, LLC, and, where applicable, Administrative Law Judge F. Joseph Brady, who is presiding over the case.


File with:

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor – Filing Room
Harrisburg, PA 17120

With a copy to:

Christopher C. Wilcoxson, Esq.
Blank Rome LLP
One Logan Square
Philadelphia, PA 19103

BLANK ROME LLP

By: 

Christopher C. Wilcoxson, Esq.
Pa. Attorney ID: 325872
One Logan Square
130 N. 18th Street
Philadelphia, PA 19103
(215) 569-5573
(215) 569-5500 (fax)
cody.wilcoxson@blankrome.com

Counsel for Rushmore Energy, LLC

Dated: November 14, 2025

**BEFORE THE
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**MOTION FOR ADMISSION PRO HAC VICE OF
NATARA FELLER ON BEHALF OF RUSHMORE ENERGY, LLC**

Pursuant to 52 Pa. Code §1.22(b) and the Pennsylvania Bar Admission Rules, 204 Pa. Code Rule 301, Christopher C. Wilcoxson an active member and a member in good standing of the bar of this Commonwealth (Attorney I.D. No. 325872), hereby moves that Natara Feller be admitted to appear pro hac vice and practice before the Pennsylvania Public Utility Commission as counsel for Rushmore Energy, LLC, in the above-captioned matter. The Verified Statement of Natara Feller is attached hereto as Exhibit “A” and relied upon in support of this Motion.

I certify that copies of this Motion and attached Verified Statement has been served on all parties of record in the above-captioned matter.

Respectfully submitted,

BLANK ROME LLP

By: 

Christopher C. Wilcoxson, Esq.
Pa. Attorney ID: 325872
One Logan Square
130 N. 18th Street
Philadelphia, PA 19103
(215) 569-5573
(215) 569-5500 (fax)
cody.wilcoxson@blankrome.com

Counsel for Rushmore Energy, LLC

Dated: November 14, 2025

CERTIFICATE OF SERVICE

I hereby certify on this 14th day of November, 2025, a copy of the foregoing Notice of Appearance has been served, via USPS mail, upon the persons listed below, in accordance with the requirements of 52 Pa. Code § 1.54:

Walter Fey
1719 Standwood Street
Philadelphia, PA 19152
Email: waltfey25262@outlook.com



Christopher C. Wilcoxson

Dated: November 14, 2025

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

WALTER FEY :
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 :
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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, Christopher C. Wilcoxson, Esquire, a member of the Bar of the Commonwealth of Pennsylvania (Attorney I.D. No. 325872), moves for my admission pro hac vice in the above-captioned proceedings. In support of Mr. Wilcoxson’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, PLLC 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; and *Melvin Smith v. Rushmore Energy, LLC*, Docket No. F-2024-3051171; and *Ailin Hospitality v. FirstEnergy Pennsylvania Electric Company and nTherm, LLC*, Docket No. C-2024-3050928; and *Lorin and Jamie DeGroat v. nTherm, LLC*, Docket No. C-2024-3052230; and *Moravian Manors, Inc. v. nTherm, LLC*, Docket No. C-2025-3053949.

6. 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.

7. I consent to the appointment of Christopher C. Wilcoxson, and the law firm of Blank Rome 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.

8. 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.

9. In support of this motion, Christopher C. Wilcoxson, Esq., attaches a Verification labeled as Exhibit B, which satisfies the requirements of the foregoing Rule of Civil Procedure.

10. 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 Rushmore Energy, LLC in the above captioned action.

Respectfully submitted,

Natara Feller

Natara Feller, Esq.
Feller Law Group, PLLC

Dated: November 14, 2025

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WALTER FEY :
 :
 v. : Docket No. C-2025-3057209
 :
 RUSHMORE ENERGY, LLC :

VERIFIED STATEMENT OF CHRISTOPHER C. WILCOXSON

I, Christopher C. Wilcoxson, hereby state as follows:

1. I am an attorney with the law firm Blank Rome LLP, admitted to practice law in the Commonwealth of Pennsylvania, and am a member in good standing of the bar, holding Bar No. 325872. 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. 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

3. 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 the District of Columbia.

4. Ms. Feller is of good moral and professional character and, if required, will swear and affirm that he 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.

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

6. 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,

By: 

Christopher C. Wilcoxson, Esq.
Pa. Attorney ID: 325872
One Logan Square
130 N. 18th Street
Philadelphia, PA 19103
(215) 569-5573
(215) 569-5500 (fax)
cody.wilcoxson@blankrome.com

Dated: November 14, 2025

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**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 _____, 2025,

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 Rushmore Energy, LLC in the above-captioned proceedings.

F. Joseph Brady
Honorable Administrative Law Judge