

ORIGINAL

IN THE SUPREME COURT OF OHIO

In the Matter of the Application of Ohio)	
Edison Company, The Cleveland Electric)	Case No. 2013-0513
Illuminating Company and The Toledo)	
Edison Company for Authority to)	On Appeal from the Public Utilities
Establish a Standard Service Offer)	Commission of Ohio
Pursuant to R.C. § 4928.143 in the Form)	
of an Electric Security Plan.)	PUCO Case No. 12-1230-EL-SSO

MOTION TO APPEAR PRO HAC VICE OF ROBERT KELTER

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FILED
 MAY 01 2013
 CLERK OF COURT
 SUPREME COURT OF OHIO

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In the Matter of the Application of Ohio)	
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MOTION TO APPEAR PRO HAC VICE OF ROBERT KELTER

Pursuant to R. XII(2)(A)(6), Robert Kelter, attorney for the Environmental Law & Policy Center, hereby moves the Supreme Court of Ohio to grant him permission to appear *pro hac vice* in the above-captioned proceeding.

Movant represents that the following is a list of the jurisdictions in which he has ever been licensed to practice law, including dates of admission to practice, and any attorney registration numbers:

- Illinois, ARDC BAR No. 6236307, admission date: December 24, 1996.
- California, BAR No. 139269, admission date: January 1989

Movant represents that he has not been granted permission to appear *pro hoc vice* in more than three proceedings before Ohio tribunals in the current calendar year pursuant to Gov.Bar R. XII(2)(A)(5).

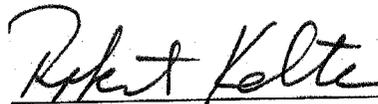
Nicholas McDaniel, an active Ohio attorney in good standing (Bar No. 0089817), has agreed to associate with Movant on this case.

The affidavit required by Gov.Bar R. XII(2)(A)(6), a copy of Movant's certificate of *pro hac vice* registration furnished by the Supreme Court of Ohio Office of Attorney Services and a certificate indicating services of this Motion on all known parties and attorneys of record are attached. Movant understands that if this motion is granted, Movant must file a Notice of

Permission to Appear *Pro Hac Vice* and a copy of the Order granting permission with the Supreme Court of Ohio Office of Attorney Services within thirty days of the Order.

Dated: May 1, 2013

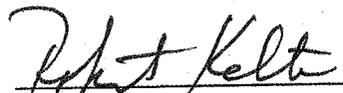
Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing *Motion to Appear Pro Hac Vice of Robert Kelter*, submitted on behalf of the Environmental Law & Policy Center, was served by electronic mail to the below listed parties, this 1st day of May, 2013.



Robert Kelter
Senior Attorney
Environmental Law & Policy Center

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IN THE MATTER OF THE MOTION OF

CASE NO. OSC Case No. 13-0513

Robert Kelter

**AFFIDAVIT OF
OUT-OF-STATE ATTORNEY**
Gov. Bar R. XII, Section 2(A)(6)

FOR PERMISSION TO APPEAR PRO HAC VICE

Robert Kelter being first duly cautioned, swears or affirms as follows:

- a. I have never been disbarred from the practice of law.
- b. I have been admitted to the practice of law in the following jurisdictions (attach additional jurisdictions if necessary):

Illinois

California

c. Choose one:

- I am not currently suspended from the practice of law in any jurisdiction where I have been admitted to practice.
- I am currently suspended from the practice of law in the following jurisdictions:

d. Choose one:

- I have not resigned from the practice of law with discipline pending in any jurisdiction where I have been admitted to practice.
- I have resigned from the practice of law with discipline pending in the following jurisdiction(s):

Robert Kelter

SIGNATURE OF APPLICANT

Sworn to or affirmed before me and subscribed in my presence the 30 day of April,

20 13, in the state of Illinois and county of Cook.



*Affix stamp & seal (required in Ohio).

Fidelia Gaines - Mitchell

SIGNATURE OF NOTARY PUBLIC*

THE SUPREME COURT *of* OHIO

OFFICE OF ATTORNEY SERVICES

IN THE MATTER OF THE APPLICATION OF

Robert Kelter

FOR PRO HAC VICE REGISTRATION

per Gov. Bar R. XII, Section 2(A)(3)

Certificate of
PRO HAC VICE
REGISTRATION

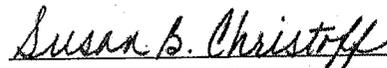
2013

Registration Number:
PHV- 2685-2013

Robert Kelter

_____ , having met the requirements of, and found to be in full compliance with, Section 2(A)(3) of Rule XII of the Rules for the Government of the Bar of Ohio, is hereby issued this certificate of pro hac vice registration in the state of Ohio.

To receive permission to appear pro hac vice in an Ohio proceeding, a motion requesting such permission must be filed with the tribunal in accordance with Section 2(A)(6) of Rule XII of the Rules for the Government of the Bar of Ohio.



Susan B. Christoff
Director, Attorney Services

Expires December 31, 2013