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PUBLIC SERVICE COMMISSION

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Mark David Goss (859) 244-3232 MGOSS@FBTLAW.COM

May 1, 2009

Mr. Jeffrey Derouen
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, Kentucky 40602-0615

Re: Case No. 2009-00100

Dear Mr. Derouen:

Enclosed please find an original and four (4) copies of the Motion for Admission *Pro Hac Vice* of Mitchell F. Brecher in the above-referenced matter. Please file the original document of record and return a file-stamped copy to me in the enclosed self-addressed, stamped envelope.

Sincerely yours,

Mark David Goss

Enclosures

cc: Mitchell F. Brecher, Esq.

Debra Mercer, Esq.

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PUBLIC SERVICE COMMISSION

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PETITION OF TRACFONE WIRELESS, INC.)
FOR DESIGNATION AS AN ELIGIBLE)
TELECOMMUNICATIONS CARRIER IN THE) PSC CASE NO
COMMONWEALTH OF KENTUCKY FOR THE) 2009-00100
LIMITED PURPOSE OF OFFERING LIFELINE AND)
LINK UP SERVICE TO QUALIFIED HOUSEHOLDS)

MOTION FOR ADMISSION PRO HAC VICE OF MITCHELL F. BRECHER

Comes now TracFone Wireless, Inc., by and through counsel, and moves the Commission for entry of an Order allowing Mitchell F. Brecher, Esq., of the law firm of Greenberg Traurig, LLP, 2101 L Street, NW, Suite 1000, Washington, D.C. 20037, to appear *pro hac vice* in this case.

In support of this Motion, the undersigned counsel states that Mr. Brecher is a member in good standing of the Bars of the State of Maryland and of the District of Columbia. In addition, he is admitted to practice before the U.S. Courts of Appeal for the District of Columbia Circuit, the Eleventh Circuit, and the Ninth Circuit, the U.S. District Court for the District of Columbia, the U.S. District Court for the District of Maryland, and the Supreme Court of the United States.

In further support of this Motion, the undersigned counsel attaches a copy of the Kentucky Bar Association Out-of-State Certification Form confirming payment of the \$100.00 fee as required by SCR 3.030(2) for permission to practice in Kentucky Public Service Commission Case Number 2009-00100.

WHEREFORE, the Commission is hereby requested to enter an Order permitting Mr. Brecher to appear *pro hac vice* in this case.

Respectfully submitted,

Mark David Goss

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250 West Main Street, Suite 2800

Lexington, KY 40507-1749

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and

Thomas P. O'Brien, III Frost Brown Todd LLC 400 West Market Street, 32nd Floor Louisville, KY 40202 (502) 589-5400 - Telephone (502) 581-1087 - Facsimile

Counsel for TracFone Wireless, Inc.

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KENTUCKY BAR ASSOCIATION OUT-OF-STATE CERTIFICATION FORM

COURT	Kentucky Public Service Commission	CASE NO.	2009-00100

SCR 3.030 Membership, practice by nonmembers and classes of membership

(2) A person admitted to practice in another state, but not in this state, shall be permitted to practice a case in this state only if that attorney subjects himself or herself to the jurisdiction and rules of the court governing professional conduct, pays a per case fee of \$100.00 to the Kentucky Bar Association and engages a member of the association as co-counsel, whose presence shall be necessary at all trials and at other times when required by the court. No motion for permission to practice in any state court in this jurisdiction shall be granted without submission to the admitting court of a certification from the Kentucky Bar Association of receipt of this fee.

The Kentucky Bar Association certifies that Mitchell F. Brecher has paid the per case fee of \$100.00 in the above referenced case as required in SCR 3.030(2).



Nicole A. Key, Deputy Registrar