

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

ELECTRONICALLY FILED

In the Matter of:

APPLICATION OF BELLSOUTH)
TELECOMMUNICATIONS, LLC FOR)
DECLARATORY ORDER REGARDING) Case No. 2015-00227
INTERCONNECTION WITH CENTRAL)
KENTUCKY NETWORK FOR 911/E911)
SERVICES TO PUBLIC SAFETY)
ANSWERING POINTS)

MOTION FOR ADMISSION
OF PATRICK CROTTY PRO HAC VICE

This motion is brought on behalf of Cincinnati Bell Telephone Co. LLC ("CBT"). CBT respectfully requests that this Tribunal permit Patrick Crotty to represent it *pro hac vice*, as co-counsel with Mark D. Guilfoyle of Dressman, Benzinger, & LaVelle, P.S.C., who is a member of the Kentucky Bar.

Respectfully submitted,

/s/ Mark D. Guilfoyle

Mark D. Guilfoyle (#27625)
DRESSMAN BENZINGER LAVELLE psc
207 Thomas More Parkway
Crestview Hills, KY 41017
Telephone: (859) 426-2149
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Email: mguilfoyle@dbllaw.com

Attorney for Cincinnati Bell Telephone Co. LLC

MEMORANDUM IN SUPPORT

Patrick Crotty is licensed to practice law in the State of Ohio and is a member in good standing of the Ohio Bar. *See* attached Affidavit of Patrick Crotty. He has agreed, if admitted *pro hac vice*, to subject himself to the rules of this Tribunal and to conduct himself at all times in a manner consistent with those rules. *Id.* He has provided the required Out-Of-State Certification Form from the Kentucky Bar Association, in accordance with SCR 3.030(2). *Id.* Mr. Crotty is familiar with the facts of this case and the applicable law. It is in the interests of justice that Mr. Crotty be admitted *pro hac vice* to represent CBT in this action, along with the undersigned counsel. A proposed Order is attached for the Tribunal's convenience.

Respectfully submitted,

/s/ Mark D. Guilfoyle

Mark D. Guilfoyle (#27625)
DRESSMAN BENZINGER LAVELLE psc
207 Thomas More Parkway
Crestview Hills, KY 41017
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Email: mguilfoyle@dbllaw.com

Attorney for Cincinnati Bell Telephone Co. LLC

CERTIFICATE OF SERVICE AND FILING

I hereby certify that the foregoing is a true and accurate copy of the same document being filed in paper medium with the Commission within two business days: that the electronic filing was transmitted to the Commission on October 16, 2015; and that there are currently no parties that the Commission has excused from participating by electronic means in this proceeding.

This 16th day of October, 2015.

/s/ Mark D. Guilfoyle

Mark D. Guilfoyle
Attorney for Cincinnati Bell Telephone Co. LLC

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AFFIDAVIT OF PATRICK CROTTY

I, Patrick Crotty, make the following affidavit under oath in support of my request to be admitted to practice *pro hac vice* before the Kentucky Public Service Commission.


1. I am an attorney with Cincinnati Bell Telephone Co. LLC, 221 East Fourth Street, Suite 1090, Cincinnati, OH 45202.
2. I am a member in good standing of the bar of the State of Ohio, where I am admitted and eligible to practice law as attorney number 0088733.
3. I consent to be subject to the jurisdiction and rules of the Kentucky Supreme Court governing professional conduct. Attached hereto is the required Out-of-State Certification Form from the Kentucky Bar Association.

Further affiant sayeth naught.



PATRICK CROTTY





Notary Public

SUSAN D. McCLARNON
Notary Public, State of Ohio
My Commission Expires 03-16-2018

KENTUCKY BAR ASSOCIATION

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KENTUCKY BAR ASSOCIATION OUT-OF-STATE CERTIFICATION FORM

COURT Kentucky Public Service Commission

CASE NO. 2015-00227

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 \$270.00 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 Patrick Crotty has paid the per-case fee of \$270.00 on October 14, 2015 in the above referenced case as required in SCR 3.030(2).

A handwritten signature in blue ink that reads 'Michele M. Pogrotsky'. The signature is written in a cursive style and is positioned above a horizontal line.

Michele M. Pogrotsky, Deputy Registrar