



Suzan DeBusk Paiva  
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May 19, 2016

**Via Electronic Filing**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

Re: Petition of Communications Workers of America for a Public,  
On-the-Record Commission Investigation of the Safety, Adequacy,  
and Reasonableness of Service Provided by Verizon Pennsylvania LLC  
Docket No. P-2015-2509336

Dear Secretary Chiavetta:

Enclosed for filing please find the Motion for Admission of Jennifer L. McClellan *PRO HAC VICE* on behalf of Verizon Pennsylvania LLC in the above referenced case.

If you have any questions, please feel free to contact me.

Very truly yours,

Suzan D. Paiva

Enclosures

Via E-Mail and U.S. First Class Mail  
CC: The Honorable Joel H. Cheskis, ALJ

CERTIFICATE OF SERVICE

I hereby certify that I have on this day served a true copy of Verizon's Motion for Admission of Jennifer L. McClellan upon the parties listed below, in accordance with the requirements of Section 1.54 (relating to service by a party) and Section 1.55 (relating to service upon attorneys).

Dated at Philadelphia, Pennsylvania, this 19<sup>th</sup> day of May 2016.

Via E-Mail and First Class Mail

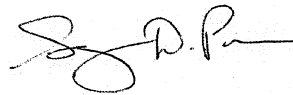
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Harrisburg, PA 17101

Bradley R. Gorter, Esq.  
Stephanie M. Wimer, Esq.  
Michael L. Swindler, Esq.  
PA Public Utility Commission  
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Suzan DeBusk Paiva  
Pennsylvania Bar I.D. No. 53853  
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Philadelphia, PA 19103  
215-466-4755

Attorney for Verizon

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

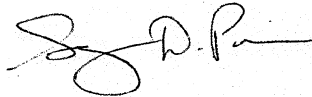
Petition of Communications Workers of :  
America for a Public, On-the-Record :  
Commission Investigation of the Safety, : Docket No. P-2015-2509336  
Adequacy, and Reasonableness of Service :  
Provided by Verizon Pennsylvania LLC :

**MOTION FOR ADMISSION OF JENNIFER L.  
McCLELLAN *PRO HAC VICE* ON BEHALF OF  
VERIZON PENNSYLVANIA LLC**

I, Suzan D. Paiva, an attorney in good standing and authorized to practice in the Commonwealth of Pennsylvania, hereby move the Pennsylvania Public Utility Commission, in accordance with 52 Pa. Code § 1.22(b) and the Pennsylvania Bar Admission Rules, 204 Pa. Code Rule 301, to permit Jennifer L. McClellan, a member of the bar of the Commonwealth of Virginia (VA Bar No. 41696), to appear *pro hac vice* in the above captioned matter on behalf of Verizon Pennsylvania LLC ("Verizon"). The Verified Statement of Suzan D. Paiva is attached to and relied upon in support of this Motion.

I hereby certify that copies of this motion and the attached Verified Statements have been served upon all parties of record in the above-captioned matter.

Respectfully submitted,



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Suzan D. Paiva (Atty ID No. 53853)  
Verizon  
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Telephone: 215-466-4755  
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[Suzan.D.Paiva@verizon.com](mailto:Suzan.D.Paiva@verizon.com)

Counsel for Verizon Pennsylvania LLC

Dated: May 19, 2016

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

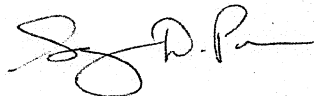
Petition of Communications Workers of :  
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Commission Investigation of the Safety, : Docket No. P-2015-2509336  
Adequacy, and Reasonableness of Service :  
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**VERIFIED STATEMENT OF SUZAN D. PAIVA**

I, Suzan D. Paiva, hereby state as follows:

1. I am Assistant General Counsel for Verizon in the State of Pennsylvania.
2. I am admitted to practice law in the Commonwealth of Pennsylvania and am in good standing with all courts and administrative agencies of the Commonwealth.
3. I regularly practice before the Pennsylvania Public Utility Commission.
4. I have never been suspended, disbarred or disciplined by any court or administrative agency, nor am I subject to any proceeding for suspension, disbarment or disciplinary action.
5. After reasonable investigation, I reasonably believe Jennifer L. McClellan, the candidate for admission *pro hac vice* before the Pennsylvania Public Utility Commission, to be a reputable and competent attorney.
6. I am in a position to recommend the admission *pro hac vice* of Jennifer L. McClellan.
7. If there should be any proceeds from the settlement of this proceeding, such proceeds 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, if applicable.

8. The foregoing statements are true to the best of my knowledge, information and belief. I understand that the statements herein made are subject to penalties of 18 Pa. C.S. § 4904, relating to unsworn falsification to authorities.



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[Suzan.D.Paiva@verizon.com](mailto:Suzan.D.Paiva@verizon.com)

Counsel for Verizon Pennsylvania LLC

DATED: May 19, 2016

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Communications Workers of :  
America for a Public, On-the-Record :  
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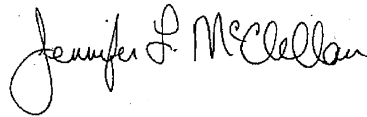
**VERIFIED STATEMENT OF JENNIFER L. McCLELLAN**

Pursuant to 52 Pa. Code §§ 1.22(b) and 5.103 and Pa. B.A.R. 301 and 1012.1, I, Suzan D. Paiva, Esquire, a member of the Bar of the Commonwealth of Pennsylvania (Attorney ID No. 53853), is moving for my admission *pro hac vice* in the above-captioned proceeding. In support of said sponsor's motion, I, the candidate, Jennifer L. McClellan, submit this verification, pursuant to Rule 1012.1:

1. I am admitted to practice and am a member in good standing of the Bar in the Commonwealth of Virginia (Bar No. 41696).
2. I have never been suspended, disbarred or otherwise disciplined, nor am I currently the subject of any disciplinary proceeding.
3. I shall comply with and be bound by the applicable statutes, case law, and procedural rules of the Commonwealth of Pennsylvania, including the Pennsylvania Rules of Professional Conduct, and shall submit to the jurisdiction of the Pennsylvania courts and the Pennsylvania Disciplinary Board with respect to the acts and omissions occurring during the appearance in the matter for which *pro hac vice* is being sought.
4. I do consent to the appointment of the sponsoring attorney, Suzan D. Paiva, Esquire, 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 matter for which admission *pro hac vice* is sought.

5. If there should be any proceeds from the settlement of this proceeding, such proceeds 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.

6. I verify that the foregoing statements are 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.



---

Jennifer L. McClellan  
Assistant General Counsel  
Verizon  
703 East Grace Street, 7<sup>th</sup> Floor  
Richmond, VA 23219  
Telephone: 804-772-1512  
[jennifer.l.mcclellan@verizon.com](mailto:jennifer.l.mcclellan@verizon.com)

Counsel for Verizon Pennsylvania LLC

DATED: May 19, 2016

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Communications Workers of :  
America for a Public, On-the-Record :  
Commission Investigation of the Safety, : Docket No. P-2015-2509336  
Adequacy, and Reasonableness of Service :  
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**ORDER GRANTING MOTION FOR ADMISSION  
*PRO HAC VICE* OF JENNIFER L. McCLELLAN**

Upon consideration of the Motion for Admission *Pro Hac Vice* of Jennifer L. McClellan,  
it is this \_\_\_ of May, 2016,

ORDERED that the Motion is hereby GRANTED; and it is further

ORDERED that Jennifer L. McClellan is admitted *pro hac vice* for the purposes of  
representing Verizon Pennsylvania LLC in the above-captioned action.

\_\_\_\_\_  
Joel H. Cheskis  
Administrative Law Judge