

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the matter of the Application of)	
the Dayton Power and Light Company)	Cause No. 12-426-EL-SSO
Approval of its Market Offer)	
)	
In the matter of the Application of)	
the Dayton Power and Light Company)	Cause No. 12-427-EL-ATA
Approval of Revised Tariffs)	
)	
In the matter of the Application of)	
the Dayton Power and Light Company)	Cause No. 12-428-EL-AAM
Approval of Certain Accounting Authority)	
)	
In the matter of the Application of)	
the Dayton Power and Light Company)	Cause No. 12-429-EL-WVR
The Waiver of Certain Commission Rules)	
)	
In the matter of the Application of)	
the Dayton Power and Light Company)	Cause No. 12-627-EL-RDR
To Establish Tariff Riders)	
)	

**MOTION REQUESTING PERMISSION FOR
MAJOR CHRISTOPHER C. THOMPSON TO APPEAR
*PRO HAC VICE***

Pursuant to Ohio Adm. Code 4901-1-8(B), Ohio Adm. Code 4901-12, and Section 2(A) of Rule XII of the Supreme Court Rules for the Government of the Bar of Ohio, now comes Mr. Bill C. Wells, admitted to practice of law in Ohio, and respectfully requests that the Public Utilities Commission of Ohio (“Commission”) grant Major Christopher C. Thompson permission to appear *pro hac vice* in this proceeding on behalf of the Federal Executive Agencies (“FEA”). The reasons that the Commission should

grant Major Thompson permission to appear *pro hac vice* are further set forth in the attached Memorandum in Support.

Respectfully submitted,

/s/ Bill C. Wells

Bill C. Wells

AFMCLO/CL

Industrial Facilities Division

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MEMORANDUM IN SUPPORT

Section 2(A) of Rule XII of the Rules for the Government of the Bar of Ohio provides that “A tribunal¹ of this state may grant permission to appear pro hac vice to an out-of-state attorney who is admitted to practice in the highest court of a state *** of the United States or the District of Columbia *** and is in good standing to appear pro hac vice in a proceeding.”² The Commission’s rules provide that a “person authorized to

¹ “A tribunal is defined as a court, legislative body, administrative agency, or other body acting in an adjudicative capacity. A legislative body, administrative agency, or other body acts in an adjudicative capacity when a neutral official, after the presentation of evidence or legal argument by a party or parties, will render a binding legal judgment directly affecting a party’s interests in a particular matter.” Section 1(A) of Rule XII of the Rules for the Government of the Bar of Ohio.

² “A proceeding is defined as an adjudicative matter pending before a tribunal.” Section 1(B) of Rule XII of the Rules for the Government of the Bar of Ohio.

practice law in other jurisdictions may be permitted to appear before the commission in a particular proceeding, upon motion of an attorney of this state.”³

Major Christopher C. Thompson has been issued a certificate of *pro hac vice* registration in the state of Ohio.⁴ Additionally, the following information is provided per Section 2(A)(6) of Rule XII of the Rules for the Government of the Bar of Ohio:

- (a) Major Thompson resides at 112 Legend Lakes Drive, Panama City Beach, FL 32408. Major Thompson is employed by the United States Air Force, 139 Barnes Dr., Tyndall Air Force Base, FL 32403.⁵
- (b) Maj Thompson is license to practice law in Nebraska #22849. He was admitted to practice on August 18, 2004.
- (c) Maj Thompson has never been disbarred, he has not been under suspension nor has he resigned from the practice of law with discipline pending in any jurisdiction the attorney has ever been admitted.
- (d) Maj Thompson has not been granted permission to appear *pro hac vice* in more than three proceedings before Ohio tribunals in the current calendar year pursuant to Section 2(A)(5) of

³ Ohio Adm. Code 4901-1-8(B).

⁴ Attachment A.

⁵ Maj Thompson’s e-mail address is as follows: chris.thompson.2@tyndall.af.mil

Rule XII of the Rules for the Government of the Bar of
Ohio.

- (e) Bill C. Wells, Ohio Attorney Registration No.0084780, an
active Ohio attorney in good standing, has agreed to
associate with Maj Thompson on this case.

The information above and Attachments A and B show that Maj Thompson meets
the Supreme Court's requirements for *pro hac vice* practice in Ohio. Accordingly, the
Commission should grant Major Christopher C. Thompson permission to appear *pro hac vice*
for the purposes of representing the FEA in this proceeding.

Respectfully submitted,

/s/ Bill C. Wells

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CERTIFICATE OF SERVICE

I hereby certify that a copy of this Motion was served on the persons stated below via electronic service, this 3rd day of January 2013.

/s/ Chris C. Thompson
Major Chris Thompson

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Case No(s). 12-0426-EL-SSO

Summary: Motion FEA motion for Pro Hac Vice electronically filed by MR CHRIS C THOMPSON on behalf of FEDERAL EXECUTIVE AGENCIES ATTY