

FILE



MCCARTHY, LEBIT, CRYSTAL & LIFFMAN CO., L.P.A.

Attorneys and Counselors at Law

Leslie E. Wargo

Writer's Ext. 232

lew@mccarthylebit.com

101 WEST PROSPECT AVENUE

SUITE 1800

CLEVELAND, OHIO 44115-1088

TELEPHONE 216.696.1422

FACSIMILE 216.696.1210

WWW.MCCARTHYLEBIT.COM

January 31, 2007

Public Utilities Commission of Ohio
Docketing Division
180 East Broad Street
Columbus, Ohio 43215-3793

PUCO

2007 FEB -2 PM 2:00

RECEIVED-DOCKETING DIV

Re: *In the Matter of the Complaints of: S.G. Foods, Inc., et al. vs. The Cleveland Electric Illuminating Company, et al.*
PUCO Case Nos. 04-28-EL-CSS; 05-803-EL-CSS; 05-1011-EL-CSS;
05-1012-EL-CSS; 05-1014-EL-CSS; 05-1020-EL-CSS; and 03-1833-EL-CSS

Dear Sir/Madam:

Enclosed for filing please find the original and eleven (11) copies of the *Motion for Admission Pro Hac Vice of Alyssa J. Endelman* to appear and participate as counsel for Complainants, Allianz Global Risks U.S. Insurance Company, Lexington Insurance Company (Lexington"), and Royal Indemnity Company, as subrogees of Republic Engineered Products, LLC, in the above-captioned consolidated matters. Please return one (1) time-stamped copy to the undersigned in the self-addressed stamped envelope provided for your convenience.

Thank you for your attention to this filing. Should you have any questions, please contact the undersigned.

Sincerely yours,

Leslie E. Wargo

/bjk

Enclosures

cc: David A. Kutik, Esq. (w/encl.)	Henry Eckhart, Esq. (w/encl.)
Mark A. Whitt, Esq. (w/encl.)	Craig Bashein, Esq. (w/encl.)
Edward F. Siegel, Esq. (w/encl.)	Joel L. Levin, Esq. (w/encl.)
Francis Sweeney, Jr., Esq. (w/encl.)	Patrick J. O'Malley, Esq. (w/encl.)
Paul W. Flowers, Esq. (w/encl.)	Leila Vespoli, Esq.
Alyssa J. Endelman, Esq. (w/encl. - by email)	

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

RECEIVED-DOCKETING DIV.
2007 FEB -2 PM 2:00
PUCO

In the Matter of the Complaints of:)
S.G. Foods, Inc., et al.; Miles Management)
Corp., et al.; Allianz US Global Risk Insurance)
Company, et al.; Lexington Insurance Company,)
et al.; BMW Pizza, Inc. and DPNY, Inc., et al.;)
Triple A Sport Wears, Inc.; and Dennis Kucinich)

Complainants,)

-vs-)

The Cleveland Electric Illuminating Company,)
Ohio Edison Company,)
Toledo Edison Company, and)
American Transmission Systems, Inc.)

Respondents.)

Case Nos. 04-28-EL-CSS
05-803-EL-CSS
05-1011-EL-CSS
05-1012-EL-CSS
05-1014-EL-CSS
05-1020-EL-CSS
03-1833-EL-CSS

CONSOLIDATED

**MOTION FOR ADMISSION PRO HAC VICE
OF
ALYSSA J. ENDELMAN**

NOW COMES Leslie E. Wargo, an attorney licensed to practice law in the State of Ohio, and pursuant to Ohio Administrative Code ("OAC") 4901-1-08(B), hereby moves the Commission to permit Alyssa J. Endelman, Esq. to appear and participate as counsel for Complainants, Allianz Global Risks U.S. Insurance Company, Lexington Insurance Company, and Royal Indemnity Company, as subrogees of Republic Engineered Products, LLC, in the above-captioned case. The reasons for this Motion are set forth in more detail in the attached Memorandum in Support.

MEMORANDUM IN SUPPORT

Leslie E. Wargo, an attorney licensed to practice law in the State of Ohio, hereby moves the Commission, pursuant to OAC 4901-1-08(B), to permit Alyssa J. Endelman to appear and participate as counsel before this Commission in all proceedings in this matter. As required by OAC 4901-1-

08(B), Alyssa J. Endelman is an attorney in good standing and is licensed to practice in the States of Michigan and Minnesota. Thus, I request that the Commission grant this Motion for Admission Pro Hac Vice because Alyssa J. Endelman has met the requisite criteria.

Dated: January 31, 2007

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Leslie Wargo", with a horizontal line extending from the end of the signature.

Leslie E. Wargo (Ohio Bar No. 0073112)
McCARTHY, LEBIT, CRYSTAL & LIFFMAN CO., L.P.A.
101 West Prospect Avenue, Suite 1800
Cleveland, Ohio 44115-1088
Telephone: (216) 696-1422
Facsimile: (216) 696-1210
E-mail: lew@mccarthylebit.com

Local Counsel for Claimants

CERTIFICATE OF SERVICE

David A. Kutik, Esq.
JONES DAY
North Point
901 Lakeside Avenue
Cleveland, Ohio 44114

Mark A Whitt, Esq.
JONES DAY
325 John H. McConnell Blvd., Suite 600
Columbus, Ohio 43215-5017

Edward F. Siegel, Esq.
5910 Landerbrook Drive, Suite 200
Cleveland, Ohio 44124

Craig Bashein, Esq.
BASHEIN & BASHEIN CO. L.P.A.
50 Public Square, Suite 3500
Cleveland, Ohio 44113

Francis Sweeney, Jr., Esq.
323 Lakeside Avenue, Suite 450
Cleveland, Ohio 44113

Joel L. Levin, Esq.
LEVIN & ASSOCIATES, CO., L.P.A.
The Tower at Erievue, Suite 1100
1301 East Ninth Street
Cleveland, Ohio 44114

Paul W. Flowers, Esq.
PAUL W. FLOWERS CO., L.P.A.
50 Public Square, 35th Floor
Cleveland, Ohio 44113

Patrick J. O'Malley, Esq.
Keis & George LLP
55 Public Square, Suite 800
Cleveland, Ohio 44113-2001

Henry Eckhart, Esq.
50 West Broad Street, Suite 2117
Columbus, Ohio 43215-3301

Leila Vespoli, Esq.
76 South Main Street
Akron, Ohio 44308

I, Leslie E. Wargo, certify that a copy of the foregoing **MOTION FOR ADMISSION PRO HAC VICE OF ALYSSA J. ENDELMAN** was served upon the above-cited individuals at the above-cited addresses by placing same in the regular United States Mail at 101 West Prospect Avenue, Suite 1800, Cleveland, Ohio 44115, with proper first class postage prepaid, this 31st day of January, 2007.



Leslie E. Wargo (Ohio Bar No. 0073112)