

FILE

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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In the Matter of the Application of Ohio
Edison Company, The Cleveland Electric
Illuminating Company and The Toledo
Edison Company for Approval of a Market
Rate Offer to Conduct a Competitive Bidding
Process for Standard Service Offer Electric
General Supply, Accounting Modifications
Associated with Reconciliation Mechanism,
And Tariffs for General Service

Case No. 08-936-EL-SSO

**MOTION FOR ADMISSION *PRO HAC VICE*
OF
DAMON E. XENOPOULOS AND SHAUN C. MOHLER**

I. MOTION FOR ADMISSION *PRO HAC VICE*

Pursuant to Ohio Administrative Code ("OAC") 4901-1-08(B), Langdon D. Bell, an attorney licensed to practice law in the State of Ohio and an experienced practitioner of utility law before this Commission hereby moves the Commission to permit Damon E. Xenopoulos and Shaun C. Mohler to appear and participate as counsel for OmniSource Corporation ("OmniSource"), a wholly-owned subsidiary of Steel Dynamics, Inc., in the above-captioned case. Mr. Bell sponsors Messrs. Xenopoulos and Mohler for admission *pro hac vice*, but he will not make substantive arguments on the issues of this case on behalf of their client OmniSource. The basis for this motion is more fully set forth in the below Memorandum in Support.

II. MEMORANDUM IN SUPPORT

Messrs. Xenopoulos and Mohler are attorneys with the law firm of Brickfield, Burchette, Ritts & Stone, P.C. located in Washington, D.C, which represents OmniSource nationwide in

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electric supply related matters. Mr. Xenopoulos is an active member of the District of Columbia Bar (No. 439379) and New York State Bar (No. 2182798), and he has also been licensed to practice law in California.¹ In addition, Mr. Xenopoulos is admitted to practice before the United States Court of International Trade, the United States Court Appeals for the District of Columbia, the United States Court of Appeals for the Ninth Circuit, and the United States Court of Appeals for the Federal Circuit. Mr. Mohler is an active member of the District of Columbia Bar (No. 457212) and the Virginia State Bar (No. 39047). Messrs. Xenopoulos and Mohler have participated in proceedings addressing energy and utility matters in various states over several years.

Contact information for Messrs. Xenopoulos and Mohler is as follows:

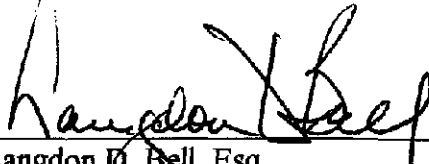
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¹ California bar membership is currently inactive at Mr. Xenopoulos' election.

III. CONCLUSION

For the reasons set forth above, OmniSource respectfully requests that the Commission grant the above Motion for Admission *Pro Hac Vice*.

Respectfully submitted,

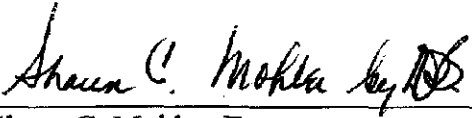
A handwritten signature in black ink, appearing to read "Langdon D. Bell", written over a horizontal line.

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Dated: September 11, 2008

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following parties of record or as a courtesy, via U.S. Mail postage prepaid, express mail, hand delivery, or electronic transmission, on September 11, 2008.



Shaun C. Mohler, Esq.

**Case 08-936-EL-SSO
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