

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Determination of the Existence of)	
Significantly Excessive Earnings for 2018 Under the)	
Electric Security Plans of Ohio Edison Company, The)	Case No. 19-1338-EL-UNC
Cleveland Electric Illuminating Company, and the Toledo)	
Edison Company)	

In the Matter of the Determination of the Existence of)	
Significantly Excessive Earnings for 2019 Under the)	
Electric Security Plans of Ohio Edison Company, The)	Case No. 20-1034-EL-UNC
Cleveland Electric Illuminating Company, and the Toledo)	
Edison Company)	

In the Matter of the Quadrennial Review Required by)	
R.C. 4928.143(E) for the Electric Security Plans of Ohio)	Case No. 20-1476-EL-UNC
Edison Company, The Cleveland Electric Illuminating)	
Company, and the Toledo Edison Company)	

**MOTION FOR ADMISSION PRO HAC VICE
OF
MICHAEL LAVANGA & JOSEPH BRISCAR**

Pursuant to Gov.Bar R. XII(2)(A)(7), Michael Lavanga and Joseph Briscar, attorneys for Nucor Steel Marion, Inc., hereby move the Public Utilities Commission of Ohio to grant them permission to appear *pro hac vice* in the above-captioned proceeding.

Movant Michael Lavanga represents that the following is a list of the jurisdictions in which he has ever been licensed to practice law, including dates of admission to practice, resignation, or retirement, and any attorney registration numbers:

- i) Virginia (#45561), admitted on December 7, 2000
- ii) District of Columbia (#473955), admitted on August 6, 2001

Movant Michael Lavanga represents that he 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 Gov.Bar R. XII(2)(A)(6).

Movant Joseph Briscar represents that the following is a list of the jurisdictions in which he has ever been licensed to practice law, including dates of admission to practice, resignation, or retirement, and any attorney registration numbers:

- i) District of Columbia (#1618550), admitted on February 11, 2019

Movant Joseph Briscar represents that he 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 Gov.Bar R. XII(2)(A)(6).

Jody Kyler Cohn (#0085402), an active Ohio attorney in good standing, has agreed to associate with Movants on this case.

The affidavits required by Gov.Bar R. XII(A)(7), a copy of Movants' certificates of *pro hac vice* registration furnished by the Supreme Court of Ohio Office of Attorney Services, and a certificate indicating service of this Motion on all known parties and attorneys of record are attached. Movants understands that, if this Motion is granted, Movants must file a Notice of Permission to Appear *Pro Hac Vice* and a copy of the Order granting permission with the Supreme Court of Ohio Office of Attorney Services within thirty days of the Order.

WHEREFORE, Michael Lavanga and Joseph Briscar respectfully move the Commission for permission to practice *pro hac vice* before the Commission in this proceeding.

Respectfully submitted,

/s/ Michael K. Lavanga

Michael K. Lavanga

PHV #1014-2020

Stone Mattheis Xenopoulos & Brew, PC

1025 Thomas Jefferson Street, NW

Suite 800, West

Washington, D.C. 20007

(202) 342-0800 (Main Number)

(202) 342-0807 (Facsimile)

/s/ Joseph R. Briscar

Joseph R. Briscar

PHV #21216-2020

Stone Mattheis Xenopoulos & Brew, PC

1025 Thomas Jefferson Street, NW

Suite 800, West

Washington, D.C. 20007

(202) 342-0800 (Main Number)

(202) 342-0807 (Facsimile)

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 electronic transmission or U.S. Mail postage prepaid on October 5, 2020.

Gregory.price@puco.oh.gov
christopher.healey@occ.ohio.gov
angela.obrien@occ.ohio.gov
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bethany.allen@igs.com
joe.oliker@igs.com
michael.nugent@igs.com

/s/ Michael K. Lavanga
Michael K. Lavanga, Esq.

IN THE MATTER OF THE MOTION OF

CASE NO. 20-1476-EL-UNC

Michael Lavanga

FOR PERMISSION TO APPEAR PRO HAC VICE

AFFIDAVIT OF
OUT-OF-STATE ATTORNEY
Gov. Bar R. XII, Section 2(A)(6)

Michael Lavanga being first duly cautioned, swears or affirms as follows:

- a. I have never been disbarred from the practice of law.
- b. I have been admitted to the practice of law in the following jurisdictions (attach additional jurisdictions if necessary):

District of Columbia

Virginia

c. Choose one:

- ☒ I am not currently suspended from the practice of law in any jurisdiction where I have been admitted to practice.
- ☐ I am currently suspended from the practice of law in the following jurisdictions:

d. Choose one:

- ☒ I have not resigned from the practice of law with discipline pending in any jurisdiction where I have been admitted to practice.
- ☐ I have resigned from the practice of law with discipline pending in the following jurisdiction(s):


SIGNATURE OF APPLICANT

Sworn to or affirmed before me and subscribed in my presence the 2nd day of October,

District of Columbia

in the state of and county of





PAMELA H. GROSS, NOTARY PUBLIC
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires April 14, 2022

Stamp & seal (required in Ohio).

THE SUPREME COURT *of* OHIO

OFFICE OF ATTORNEY SERVICES

IN THE MATTER OF THE APPLICATION OF

Michael Lavanga

FOR PRO HAC VICE REGISTRATION

per Gov. Bar R. XII, Section 2(A)(3)

Michael Lavanga

_____, having met the requirements of, and found to be in full compliance with, Section 2(A)(3) of Rule XII of the Rules for the Government of the Bar of Ohio, is hereby issued this certificate of pro hac vice registration in the state of Ohio.

To receive permission to appear pro hac vice in an Ohio proceeding, a motion requesting such permission must be filed with the tribunal in accordance with Section 2(A)(6) of Rule XII of the Rules for the Government of the Bar of Ohio.

Certificate of
PRO HAC VICE
REGISTRATION

2020

Registration Number:
PHV- 1014-2020



Gina White Palmer
Director, Attorney Services

Expires December 31, 2020

IN THE MATTER OF THE MOTION OF

CASE NO. 20-1476-EL-UNC

Joseph Briscar

FOR PERMISSION TO APPEAR PRO HAC VICE

AFFIDAVIT OF

OUT-OF-STATE ATTORNEY

Gov. Bar R. XII, Section 2(A)(6)

Joseph Briscar being first duly cautioned, swears or affirms as follows:

- a. I have never been disbarred from the practice of law.
- b. I have been admitted to the practice of law in the following jurisdictions (attach additional jurisdictions if necessary):

District of Columbia

c. Choose one:

- ☒ I am not currently suspended from the practice of law in any jurisdiction where I have been admitted to practice.
- ☐ I am currently suspended from the practice of law in the following jurisdictions:

d. Choose one:

- ☒ I have not resigned from the practice of law with discipline pending in any jurisdiction where I have been admitted to practice.
- ☐ I have resigned from the practice of law with discipline pending in the following jurisdiction(s):

SIGNATURE OF APPLICANT

Sworn to or affirmed before me and subscribed in my presence the 2nd day of October,

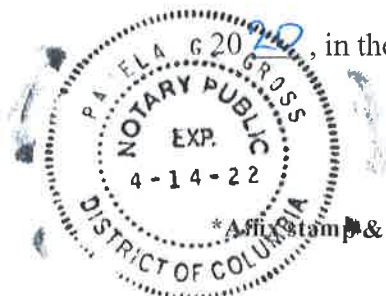
District of Columbia

in the state of and county of

*Affix stamp & seal (required in Ohio).

Pamela M. Gross

SIGNATURE OF NOTARY PUBLIC*
PAMELA G. GROSS
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires April 14, 2022



THE SUPREME COURT *of* OHIO

OFFICE OF ATTORNEY SERVICES

IN THE MATTER OF THE APPLICATION OF

Joseph Briscar

FOR PRO HAC VICE REGISTRATION

per Gov. Bar R. XII, Section 2(A)(3)

Certificate of
PRO HAC VICE
REGISTRATION

2020

Registration Number:
PHV- 21216-2020

Joseph Briscar

_____, having met the requirements of, and found to be in full compliance with, Section 2(A)(3) of Rule XII of the Rules for the Government of the Bar of Ohio, is hereby issued this certificate of pro hac vice registration in the state of Ohio.

To receive permission to appear pro hac vice in an Ohio proceeding, a motion requesting such permission must be filed with the tribunal in accordance with Section 2(A)(6) of Rule XII of the Rules for the Government of the Bar of Ohio.



Gina White Palmer
Director, Attorney Services

Expires December 31, 2020

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

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in

Case No(s). 19-1338-EL-UNC, 20-1034-EL-UNC, 20-1476-EL-UNC

Summary: Motion Motion for Admission Pro Hac Vice of Michael Lavanga and Joseph Briscar electronically filed by Mr. Michael K. Lavanga on behalf of Nucor Steel Marion, Inc.