

BOEHM, KURTZ & LOWRY

ATTORNEYS AT LAW
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CINCINNATI, OHIO 45202
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Via Electronic Mail puc.filingcenter@state.or.us
And Overnight Mail

April 7, 2015

Public Utility Commission of Oregon
3930 Fairview Industrial Drive SE
Salem, Oregon 97302-1166
Attn: Filing Center

Re: Case No. UE-294

Dear Sir or Madam:

Please find enclosed the original and five (5) copies each of: 1) MOTION FOR ADMISSION PRO HAC VICE; 2) CERTIFICATES OF COMPLIANCE; and 3) AFFIDAVITS OF KURT J. BOEHM and JODY KYLER COHN on behalf of THE FRED MEYERS STORES, A WHOLLY OWNED SUBSIDIARY OF THE KROGER CO. AND QUALITY FOOD CENTERS, DIVISION OF THE FRED MEYER STORES, INC. for filing in the above referenced matter. I also include the confirmation e-mail verifying e-filing of the above.

Copies have been served on all parties of record. Please place this document of file.

Very truly yours,



Kurt J. Boehm, Esq.
Jody Kyler Cohn, Esq.

BOEHM, KURTZ & LOWRY

KJBkew
Enclosure
cc: Certificate of Service

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 294

In The Matter Of
PORTLAND GENERAL ELECTRIC COMPANY

Request for a General Rate Revision

: MOTION FOR ADMISSION PRO HAC VICE AND
: AFFIDAVITS OF KURT J. BOEHM and JODY
: KYLER COHN, COUNSEL FOR THE
: FRED MEYER STORES, INC., A WHOLLY OWNED
: SUBSIDIARY OF THE KROGER CO. AND
: QUALITY FOOD CENTERS, A DIVISION OF THE
: FRED MEYER STORES, INC.

NOW COMES Nona M. Soltero, an attorney licensed to practice law in the State of Oregon, and hereby moves the Commission to permit Kurt J. Boehm, Esq. and Jody Kyler Cohn, Esq. to appear and participate as co-counsel for Intervenor Fred Meyer Stores, Inc. a subsidiary of The Kroger Co. and Quality Food Centers, a division of Fred Meyer Stores, Inc. in the above-captioned case. The reasons for this Motion are set forth in the attached Memorandum in Support.

Respectfully submitted,



NONA M. SOLTERO
OSB 82123

MEMORANDUM IN SUPPORT

Nona M. Soltero, an attorney licensed to practice law in the State of Oregon, hereby moves the Commission to permit Kurt J. Boehm, Esq. and Jody Kyler Cohn, Esq. to appear and participate as counsel before this Commission in all proceedings in this matter. Kurt J. Boehm, Esq. is a licensed attorney in good standing in Ohio and Kentucky. Jody Kyler Cohn is a licensed attorney in good standing in Ohio and Kentucky. Copies of Certificates of Good Standing from each jurisdiction in which the applicants are licensed are attached. Applicants also attach a Certificate of Liability Insurance verifying that the applicants are insured.

Thus, the Commission should grant this Motion for Admission Pro Hac Vice.

Respectfully submitted,



NONA M. SOLTERO
OSB 82123

March 20, 2015

In re: Kurt J. Boehm
Name of Out-of-State Attorney

Certificate of Compliance For Pro Hac Vice Admission

I, Kurt J. Boehm (print name), am an attorney in the State of Ohio & Kentucky and I intend to seek *pro hac vice* admission in accordance with ORS 9.241 and UCR 3.170 in the following Oregon court action or proceeding:

Case Name: Portland General Electric Request for Increase in Rates
Court: Public Utility Commission Case No.: UE 294

I certify that (check all that apply):

- I am an attorney in good standing in the State of Ohio and Kentucky, as evidenced by the attached good standing certificate issued by the licensing authority in that state.
 - I am not subject to any pending disciplinary proceedings in any jurisdiction; or
 - I am subject to pending disciplinary proceedings in another jurisdiction, the nature and status of which are described in an attachment to this certificate.
- I intend to associate in the above-referenced action or proceeding with Nona M. Soltero, OSB No. 82123, an active member in good standing of the Oregon State Bar, who will participate meaningfully in the matter.
- I will comply with applicable statutes, laws, and procedural rules of the State of Oregon; be familiar with and comply with disciplinary rules of the Oregon State Bar; and submit to the jurisdiction of the Oregon courts and Oregon State Bar with respect to acts and omissions occurring during my *pro hac vice* admission.
- My private law practice activities in Oregon are covered by professional liability insurance substantially equivalent to the Oregon State Bar Professional Liability Fund plan, as evidenced by the attached certificate of insurance coverage.
- I agree, as a continuing obligation of *pro hac vice* admission, to notify the trial court promptly of any changes in my insurance coverage, or my admission or disciplinary status in any other jurisdiction.
- I will provide to the Oregon State Bar a copy of the order admitting me *pro hac vice* in the above-referenced matter when such an order is granted. In the event *pro hac vice* admission is revoked for any reason, I will promptly notify the Oregon State Bar.
- I submit \$250 to the Oregon State Bar as payment of the *pro hac vice* fee established by ORS 9.241 and the rules of the Oregon Supreme Court. I acknowledge that this fee is for a period of twelve months from the date of the Acknowledgment of Receipt issued below, and that an additional fee of \$250 will be required in order for me to continue my *pro hac vice* admission in the matter for every twelve-month period thereafter.

Dated this 20 day of March, 2015.

X KBohm
(Applicant Signature)

Mailing Address: Boehm, Kurtz & Lowry
36 E. Seventh St., Suite 1510
Cincinnati, Ohio 45202

Ohio Bar No.: 0076047
(Home Jurisdiction)
Phone: 513.421.2255
FAX: 513.421.2764
Email: kboehm@BKLawfirm.com

Acknowledgment of Receipt

As Regulatory Services Counsel of the Oregon State Bar, I acknowledge receipt from the above-named out-of-state attorney of the Certificate of Compliance for Pro Hac Vice Admission and attachments, and the \$250 fee for pro hac vice appearance in the above-referenced Oregon action or proceeding. The fee is for a period of twelve months from the date of this acknowledgment.

Dated this 15th day of April, 2015.

SEE MATERIALS ATTACHED

Note that the professional liability coverage deductible substantially exceeds that of the PLF.

[Signature]
Regulatory Services Counsel

4. Counsel will notify the trial court or administrative body promptly of any changes in insurance or status.

Respectfully submitted,



Kurt J. Boehm, Esq.

BOEHM, KURTZ & LOWRY

36 E. Seventh St., Suite 1510

Cincinnati, Ohio 45202

Ph: 513.421.2255 Fax: 513.421.2764

kboehm@bkllawfirm.com

Sworn to and subscribed before me on this
20 day of March, 2015.



Notary Public

Kimberly Walton
Notary Public, State of Ohio
My Commission Expires 08-26-2019

KENTUCKY BAR ASSOCIATION

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www.kybar.org



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Eileen M. O'Brien

Michael M. Pitman

W. Fletcher Schrock

Gary J. Sergent

Bobby Simpson

J. Steven Smith

John Vincent

THIS IS TO CERTIFY THAT

KURT JOSEPH BOEHM

36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Membership No. 89327

is an active member in good standing with the Kentucky Bar Association as required by the Rules of the Supreme Court of Kentucky. Dated this 6th day of January, 2015.

JOHN D. MEYERS
REGISTRAR



By:

Michele M. Pogrotsky

Michele M. Pogrotsky, Deputy Registrar

The Supreme Court of Ohio

C E R T I F I C A T E

I, SUSAN B. CHRISTOFF, Director of the Attorney Services Division of the Supreme Court of Ohio, do hereby certify that I am the custodian of the records of the Office of Attorney Services of the Supreme Court and that the Attorney Services Division is responsible for reviewing Court records to determine the status of Ohio attorneys. I further certify that, having fulfilled all of the requirements for admission to the practice of law in Ohio,

Kurt Joseph Boehm

was admitted to the practice of law in Ohio on May 09, 2003; has registered as an active attorney pursuant to the Supreme Court Rules for the Government of the Bar of Ohio; is in good standing with the Supreme Court of Ohio; and is entitled to practice law in this state.

IN TESTIMONY WHEREOF, I have subscribed my name and affixed the seal of the Supreme Court, this 8th day of January, 2015.

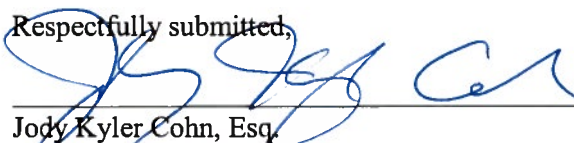
SUSAN B. CHRISTOFF

Director, Attorney Services Division


Teresa L. McCoy
Attorney Services Specialist

4. Counsel will notify the trial court or administrative body promptly of any changes in insurance or status.

Respectfully submitted,



Jody Kyler Cohn, Esq.

BOEHM, KURTZ & LOWRY

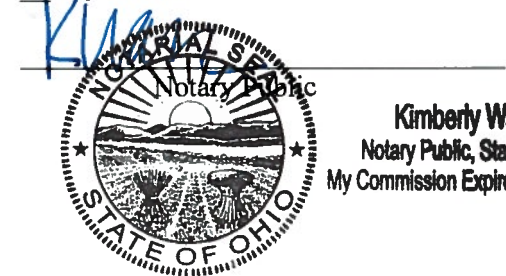
36 E. Seventh St., Suite 1510

Cincinnati, Ohio 45202

Ph: 513.421.2255 Fax: 513.421.2764

jkylercohn@bkllawfirm.com

Sworn to and subscribed before me on this
20 day of March, 2015.



Kimberly Walton
Notary Public, State of Ohio
My Commission Expires 08-26-2019

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J. D. Meyer
Eileen M. O'Brien
Michael M. Pitman
W. Fletcher Schrock
Gary J. Sergent
Bobby Simpson
J. Steven Smith
John Vincent

THIS IS TO CERTIFY THAT

JODY MICHELLE KYLER COHN

*Boehm Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202*

Membership No. 94725

is an active member in good standing with the Kentucky Bar Association as required by the Rules of the Supreme Court of Kentucky. Dated this 6th day of January, 2015.



**JOHN D. MEYERS
REGISTRAR**

By: *Michele Pogrotsky*
Michele M. Pogrotsky, Deputy Registrar

The Supreme Court of Ohio

C E R T I F I C A T E

I, SUSAN B. CHRISTOFF, Director of the Attorney Services Division of the Supreme Court of Ohio, do hereby certify that I am the custodian of the records of the Office of Attorney Services of the Supreme Court and that the Attorney Services Division is responsible for reviewing Court records to determine the status of Ohio attorneys. I further certify that, having fulfilled all of the requirements for admission to the practice of law in Ohio,

Jody Michelle Kyler Cohn

was admitted to the practice of law in Ohio on November 09, 2009; has registered as an active attorney pursuant to the Supreme Court Rules for the Government of the Bar of Ohio; is in good standing with the Supreme Court of Ohio; and is entitled to practice law in this state.

IN TESTIMONY WHEREOF, I have subscribed my name and affixed the seal of the Supreme Court, this 8th day of January, 2015.

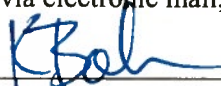
SUSAN B. CHRISTOFF

Director, Attorney Services Division


Teresa L. McCoy
Attorney Services Specialist

CERTIFICATE OF SERVICE

I hereby certify that true copy of the foregoing was served via electronic mail, unless otherwise noted, this 7TH day of April, 2015.


Kurt J. Boehm, Esq.
Jody Kyler Cohn, Esq.

<u>ACTIONS</u>	<u>SERVICE LIST (Parties)</u>	<u>SCHEDULE</u>
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