

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 435

In The Matter Of	:	MOTION FOR ADMISSION PRO HAC
	:	VICE OF FRED MEYER STORES AND
PORTLAND GENERAL ELECTRIC	:	QUALITY FOOD CENTERS,
COMPANY	:	DIVISIONS OF
Request for a General Rate Revision	:	THE KROGER CO.

NOW COMES Peter Vaughan Shaver, 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. and Quality Food Centers, Divisions of The Kroger Co. in the above-captioned case. The reasons for this Motion are set forth in the attached Memorandum in Support.

Respectfully submitted,

/s/ Peter Vaughan Shaver
Peter Vaughan Shaver, Esq. (OSB #991075)
Sound Advice, LLC
3939 NE Hancock Street, Suite 308
Portland, OR 97212
Ph: 503-473-8252
E-mail: pv@pdxsa.com

Dated: April 4, 2024

MEMORANDUM IN SUPPORT

Peter Vaughan Shaver, 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 and Jody Kyler Cohn are licensed attorneys in good standing in Ohio. Copies of Certificates of Good Standing from each applicant is 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,

/s/ Peter Vaughan Shaver
Peter Vaughan Shaver, Esq. (OSB #991075)
Sound Advice, LLC
3939 NE Hancock Street, Suite 308
Portland, OR 97212
Ph: 503-473-8252
E-mail: pv@pdxsa.com

Dated: April 4, 2024

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
and I intend to seek pro hac vice admission in accordance with ORS 9.241 and UTCR 3.170 in the following Oregon court action or proceeding:

Case Name: Portland General Request for General Rate Revision

Court: Oregon Public Utility Commission Case No.: UE 435

I certify that (check all that apply):

- I am an attorney in good standing in the State of OHIO, 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 Peter Vaughan Shaver, OSB No. 991075, 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 \$500 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 \$500 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 4th day of April, 2024.

X Kurt J. Boehm
(Applicant Signature)

Digitally signed by Kurt J. Boehm
Date: 2024.04.04 16:55:39 -04'00'

OHIO Bar No.: 0076047
(Home Jurisdiction)

Mailing Address: 36 E. Seventh Street, Suite 1510
Cincinnati, Ohio 45202

Phone: 513.421.2255
FAX: 513.421.2764
Email: kboehm@bklawfirm.com

Acknowledgment of Receipt

As Director of Regulatory Services 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 \$500 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 _____ day of _____, 20 ____.

SEE MATERIALS ATTACHED:

Troy Wood, Regulatory Counsel



THE SUPREME COURT *of* OHIO

CERTIFICATE OF GOOD STANDING

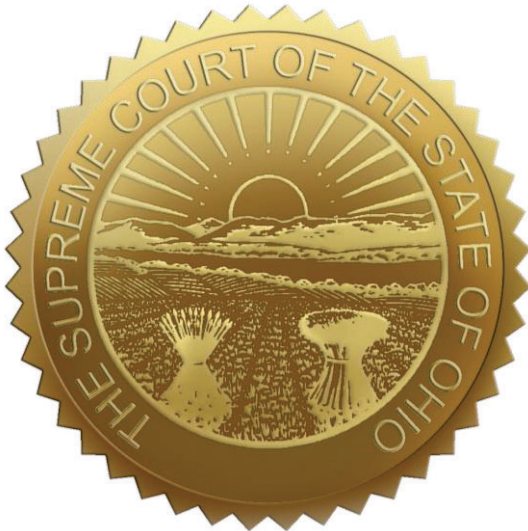
I, MICHEL JENDRETZKY, Director of the Attorney Services Division of the Supreme Court of Ohio, do hereby certify that I am the custodian of the records of the Office of Attorney Services of the Supreme Court and that the Attorney Services Division is responsible for reviewing Court records to determine 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
Attorney Registration No. **0076047**

was admitted to the practice of law in Ohio on May 9, 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 7th day of March,
2024.

MICHEL JENDRETZKY
Director, Attorney Services Division




Jennifer Smith, *Administrative Assistant*
Office of Attorney Services



No. 2024-03-07-1

Verify by email at GoodStandingRequests@sc.ohio.gov

In re: Jody Kyler Cohn
Name of Out-of-State Attorney

Certificate of Compliance
For Pro Hac Vice Admission

I, Jody Kyler Cohn (print name), am an attorney in the State of OHIO
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 Request for General Rate Revision

Court: Oregon Public Utility Commission Case No.: UE 435

I certify that (check all that apply):

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 - 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.
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- 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.
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Dated this 4th day of April, 2024.

X Jody Kyler cohn
(Applicant Signature)

Digitally signed by Jody Kyler
cohn
Date: 2024.04.04 16:56:06 -04'00'

OHIO Bar No.: 0085402
(Home Jurisdiction)

Mailing Address: 36 E. Seventh Street, Suite 1510
Cincinnati, Ohio 45202

Phone: 513.421.2255
FAX: 513.421.2764
Email: jkylercohn@bkllawfirm.com

Acknowledgment of Receipt

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Dated this _____ day of _____, 20 _____.

SEE MATERIALS ATTACHED:

Troy Wood, Regulatory Counsel



THE SUPREME COURT *of* OHIO

CERTIFICATE OF GOOD STANDING

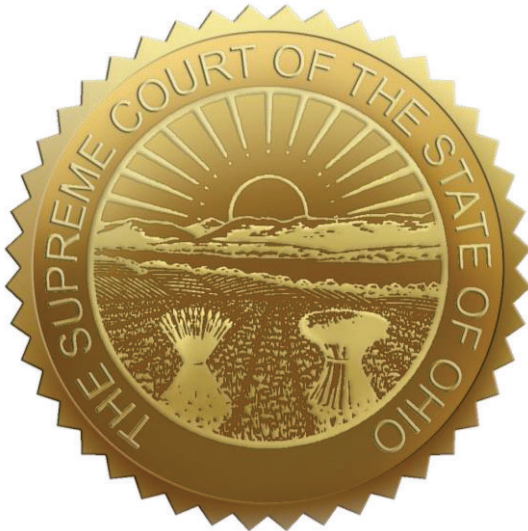
I, MICHEL JENDRETZKY, Director of the Attorney Services Division of the Supreme Court of Ohio, do hereby certify that I am the custodian of the records of the Office of Attorney Services of the Supreme Court and that the Attorney Services Division is responsible for reviewing Court records to determine 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
Attorney Registration No. **0085402**

was admitted to the practice of law in Ohio on November 9, 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 7th day of March,
2024.

MICHEL JENDRETZKY
Director, Attorney Services Division




Jennifer Smith, *Administrative Assistant*
Office of Attorney Services



No. 2024-03-07-1

Verify by email at GoodStandingRequests@sc.ohio.gov

DECLARATIONS

PROFESSIONAL LIABILITY POLICY

(THIS IS A CLAIMS-MADE AND REPORTED POLICY, READ CAREFULLY)

Policy No. **F310381-07-23** Firm Number: **0001223623**

Item 1. Named Insured(s) and Office Address:

**Boehm Kurtz & Lowry
36 E Seventh St Ste 1510
Cincinnati OH 45202**

Item 2. **Policy Period:** From: **July 1, 2023** To: **July 1, 2024 12:01 A.M.**,
Eastern Standard Time at the address of Named Insured as stated herein

Item 3. Limits of Liability: **\$5,000,000** to all claims arising out of the same,
related or continuing “**Professional Services**”
\$5,000,000 aggregate per policy period

Item 4. Deductible Amount: **\$25,000**
(Includes Claims Expense)

Item 5. Total Policy Premium: