

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 416

In The Matter Of	:	MOTION FOR ADMISSION PRO HAC
	:	VICE OF KURT J. BOEHM and JODY
PORTLAND GENERAL ELECTRIC	:	KYLER COHN, COUNSEL FOR THE FRED
COMPANY	:	MEYER STORES, INC. AND QUALITY
Request for a General Rate Revision	:	FOOD CENTERS, DIVISIONS OF
	:	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: March 7, 2023

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, 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,

/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: March 7, 2023



Oregon

Kate Brown, Governor

OFFICE OF ADMINISTRATIVE HEARINGS

PO Box 14020
Salem, OR 97309
(503) 947-1918
FAX (503) 947-1920

In re: Kurt J. Boehm) **Certificate of Compliance**
Name of Out-of-State Attorney) **For Pro Hac Vice Admission**

I, Kurt J. Boehm (print), am an attorney in the State of Ohio, and I intend to seek *pro hac vice* admission in accordance with ORS 9.241, OAR 137-003-0550 and UTCR 3.170 in the following Office of Administrative Hearings proceeding:

Case Name: Portland General Electric Co. Request for General Rate Revision
Case No.: UE 416 **Agency Name** Oregon Public Utility Commission

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 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 promptly notify the Agency and the Office of Administrative Hearings 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 this matter when such an order is granted. In the event *pro hac vice* admission is revoked, I will promptly notify the Oregon State Bar.
 - I acknowledge this application is for a period of twelve months from the date of the approval and new application must be submitted to continue my *pro hac vice* admission in the matter for every twelve-month period thereafter.
- Dated this 7 day of March, 2023.

X _____	Ohio _____ Bar No.: <u>0076047</u>
(Applicant Signature)	(Home Jurisdiction)
Mailing Address: <u>36 E. Seventh St., Suite 1510</u>	Phone: <u>513.421.2255</u>
<u>Cincinnati, Ohio 45202</u>	FAX: <u>513.421.2764</u>
_____	Email: <u>kboehm@bkllawfirm.com</u>

APPLICATION APPROVAL STATUS: **APPROVED** **NOT APPROVED**

Dated this _____ day of _____, 20____.

Signature

Printed Name

Printed Title



THE SUPREME COURT *of* OHIO

CERTIFICATE OF GOOD STANDING


I, GINA WHITE PALMER, 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,

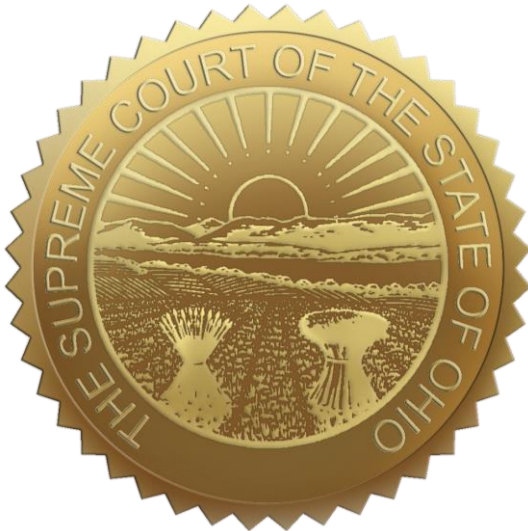
Kurt Joseph Boehm
Attorney Registration No. **0076047**

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,
2023.

GINA WHITE PALMER
Director, Attorney Services Division


Kirstyn Moyers, Attorney Services Specialist
Office of Attorney Services



No. 2023-03-07-1

Verify by email at GoodStandingRequests@sc.ohio.gov



Oregon

Kate Brown, Governor

OFFICE OF ADMINISTRATIVE HEARINGS

PO Box 14020
Salem, OR 97309
(503) 947-1918
FAX (503) 947-1920

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

Certificate of Compliance For *Pro Hac Vice* Admission

I, Jody Kyler Cohn (print), am an attorney in the State of Ohio, and I intend to seek *pro hac vice* admission in accordance with ORS 9.241, OAR 137-003-0550 and UTCR 3.170 in the following Office of Administrative Hearings proceeding:

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Case No.: UE 416 Agency Name: Oregon Public Utility Commission

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 - 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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- 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.
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Dated this 7th day of March 2023

X _____
(Applicant Signature)

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

Ohio _____ Bar No. 0085402
(Home Jurisdiction) Phone: 513.421.2255
FAX: 513.421.2764
Email: jkylercohn@bkllawfirm.com

APPLICATION APPROVAL STATUS: **APPROVED** **NOT APPROVED**

Dated this _____ day of _____, 20____.

Signature

Printed Name

Printed Title



THE SUPREME COURT *of* OHIO

CERTIFICATE OF GOOD STANDING

I, GINA WHITE PALMER, 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,

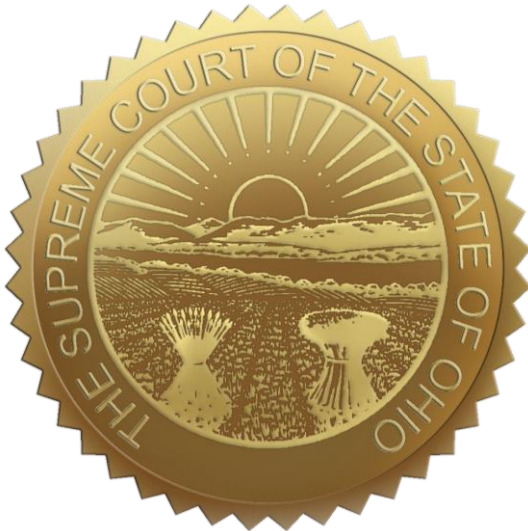
Jody Michelle Kyler Cohn
Attorney Registration No. **0085402**

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,
2023.

GINA WHITE PALMER

Director, Attorney Services Division



Kirstyn Moyers

*Kirstyn Moyers, Attorney Services Specialist
Office of Attorney Services*



No. 2023-03-07-1

Verify by email at GoodStandingRequests@sc.ohio.gov

DECLARATIONS

PROFESSIONAL LIABILITY POLICY

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

Policy No. **F310381-07-22** 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, 2022** To: **July 1, 2023 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: 