

COLE, RAYWID & BRAVERMAN, L.L.P.

ATTORNEYS AT LAW
1919 PENNSYLVANIA AVENUE, N.W., SUITE 200
WASHINGTON, D.C. 20006-3458
TELEPHONE (202) 659-9750
FAX (202) 452-0067
WWW.CRBLAW.COM

T. SCOTT THOMPSON
WRITER'S E-MAIL
STHOMPSON@CRBLAW.COM

LOS ANGELES OFFICE
2381 ROSECRANS AVENUE, SUITE 110
EL SEGUNDO, CALIFORNIA 90245-4290
TELEPHONE (310) 643-7999
FAX (310) 643-7997

JANUARY 6, 2006

BY FEDERAL EXPRESS

Public Utility Commission Of Oregon
Attn: Filing Center
550 Capitol Street N.E., Suite 215
Salem, Oregon 97308

**Re: Charter Communications Holding Company, LLC v. Central Lincoln
People's Utility District**

Dear Sir/Madam:

Enclosed, for filing, are an original and one copy each of the following:

- Complaint of Charter Communications Holding Company, LLC, *et al.* ("Charter") against Central Lincoln People's Utility District ("CLPUD"), and accompanying exhibits 1 through 5.
- Charter's Motion For Emergency Interim Relief, accompanying exhibits 1 through 14, and Declarations of Frank Antonovich and Gary Lee in support of Charter's Motion.
- Motion for Admission *Pro Hac Vice*, and accompanying Declaration of T. Scott Thompson in support.

Also enclosed is an additional copy of each of the above filings, which we request that the Commission stamp as filed and return to the below-signed via the enclosed pre-paid FedEx package.

A copy of each of the enclosed filings has also been electronically filed with the Commission today, and served via FedEx on Paul Davies, General Manager of CLPUD, at 2129 N. Coast Hwy, Newport OR 97365.

Public Utility Commission Of Oregon

January 6, 2006

Page 2

If you have any questions, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "T. Scott Thompson". The signature is fluid and cursive, with the first name "T." and last name "Thompson" clearly visible.

T. Scott Thompson

Enclosures

cc: Paul Davies, CLPUD (w/ enclosures)
Peter Gintner, Esq., Counsel for CLPUD (w/ enclosures)
Brooks E. Harlow, Esq.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

CHARTER COMMUNICATIONS
HOLDING COMPANY, LLC, FALCON
TELECABLE, L.P., FALCON CABLE
SYSTEMS COMPANY II, L.P., AND
FALCON COMMUNITY VENTURES I,
L.P.

Case No.

Complainants,

v.

CENTRAL LINCOLN PEOPLE’S UTILITY
DISTRICT,

Defendant.

MOTION FOR *PRO HAC VICE* ADMISSION

Complainant, Charter Communications Holding Company, LLC on its own behalf and on behalf of its subsidiaries, Falcon Telecable, L.P., Falcon Cable Systems Company II, L.P., and Falcon Community Ventures I, L.P., respectfully moves the Commission for an order granting T. Scott Thompson admission *pro hac vice*. This motion is supported by the affidavit of T. Scott Thompson, and the accompanying certificate of good standing from the District of Columbia Court of Appeals and proof of insurance for Mr. Thompson.

WHEREFORE, Charter respectfully moves the Commission to issue an order granting this Motion and allow Applicant to represent Complainants in this action.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

DATED this 5th day of January, 2006.

MILLER NASH LLP



Brooks E. Harlow
OSB No. 03042

Attorneys for Claimant
Charter Communications Holding
Company, LLC; Falcon Telecable, L.P.,
Falcon Cable Systems Company II, L.P.,
And Falcon Community Ventures I, L.P.

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

CHARTER COMMUNICATIONS
HOLDING COMPANY, LLC, FALCON
TELECABLE, L.P., FALCON CABLE
SYSTEMS COMPANY II, L.P., AND
FALCON COMMUNITY VENTURES I,
L.P.

Complainants,

v.

CENTRAL LINCOLN PEOPLE'S UTILITY
DISTRICT,

Defendant.

Case No.

**AFFIDAVIT OF T. SCOTT THOMPSON
IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE***

I, T. Scott Thompson, declare as follows:

1. I am a Partner at the law firm of Cole, Raywid & Braverman, L.L.P.
2. I am a member in good standing of the District of Columbia Bar, as evidenced by the certificate of good standing attached hereto as Attachment 1. I am also admitted to practice before the District of Columbia Court of Appeals, and the courts of the District of Columbia. In addition, I am admitted to practice before the United States Court of Appeals for the District of Columbia Circuit, the United States District Court for the District of Columbia, the United States Court of Appeals for the Federal Circuit, the United States Court of Appeals for the Second Circuit and the United States Court of Appeals for the Eleventh Circuit.

3. I have never been subject to any disciplinary action in any court or bar association and there is no pending disciplinary proceeding against me in any jurisdiction.

4. I will associate with Brooks E. Harlow (OSB No. 03042), an active member in good standing of the Oregon State Bar. Mr. Harlow will participate in the above-referenced action in a meaningful manner.

5. I will comply with applicable statutes, laws, and procedural rules of the State of Oregon and the Oregon Public Utilities Commission; be familiar with and comply with the disciplinary rules of the Oregon State Bar; and submit to the jurisdiction of the Oregon courts and the Oregon State Bar with respect to acts and omissions occurring during my *pro hac vice* admission.

6. Attached hereto as Attachment 2 is evidence that my private law practice activities in Oregon are covered by professional liability insurance substantially equivalent to the Oregon State Bar Professional Liability Fund plan.

7. I agree, as a continuing obligation of *pro hac vice* admission, to notify the Commission of any changes in my insurance coverage, or my admission or disciplinary status in any other jurisdiction.

I swear that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: January 5, 2006



T. Scott Thompson

ATTACHMENT 1
CERTIFICATE OF GOOD STANDING



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710


I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

THOMAS SCOTT THOMPSON

was on the 6TH day of DECEMBER, 1993
duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on January 4, 2006.

GARLAND PINKSTON, JR., CLERK

By: 
Deputy Clerk

**ATTACHMENT 2
PROOF OF INSURANCE**

Lawyers Professional Liability Policy Declarations

Agency Branch Prefix Policy Number
020970 969 LPC 133424586

Insurance is provided by Continental Casualty
Company, CNA Plaza, Chicago, IL 60685.
A Stock Insurance Company.

1. **NAMED INSURED AND ADDRESS:**
Cole, Raywid & Braverman, L.L.P.
1919 Pennsylvania Avenue, N.W.
Suite 200
Washington, DC 20006-3458

NOTICE TO POLICYHOLDERS:
This is a Claims Made and Reported policy. It
applies only to those claims that are both first made
against the insured and reported in writing to the
Company during the policy period. Please review the
policy carefully and discuss this coverage with your
insurance agent or broker.

2. **POLICY PERIOD:**

Inception: 05/02/2005 Expiration: 05/02/2006
at 12:01 A.M. Standard Time at the address shown above.

3. **LIMITS OF LIABILITY:**
Inclusive of Claims Expenses

Each Claim:	\$ 10,000,000
Aggregate:	\$ 10,000,000
Death or Disability and Non-Practicing Extended Reporting Period Limit of Liability:	Each Claim: \$ 1,000,000 Aggregate: \$ 2,000,000

4. **DEDUCTIBLES:**
Inclusive of Claims Expenses

Per Claim \$ 250,000

5. **POLICY PREMIUM:**

\$ 243,594.00

6. **FORMS AND ENDORSEMENTS ATTACHED AT INCEPTION:**

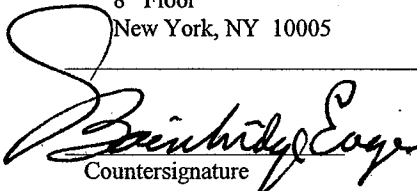
G-118011-A (ED. 07/01)	G-118031-A (ED. 03/02)	G-118039-A08 (ED. 06/01)	G-118049-A (ED. 09/96)
G-118016-A (ED. 09/96)	G-144872-A (ED. 01/03)	G-144959-A (ED. 11/02)	PRO9482 (05-04)

7. **WHO TO CONTACT:**

To report a claim:

Shauna Reeder
CNA Insurance
40 Wall Street
8th Floor
New York, NY 10005

Phone: (212) 440-3773
Fax: (212) 440-3710


Countersignature

6/7/05
Date


Authorized Representative

Date

Bainbridge Eager & Associates, Inc.

Bainbridge Eager & Assoc Inc
1350 Conn Ave NW #850
Washington, DC 20036
Ph 293-7666 / Fax 293-7667

G-118012-A (Ed. 3/99)

1
2
3
4 BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
5
6

7 CHARTER COMMUNICATIONS
8 HOLDING COMPANY, LLC, FALCON
9 TELECABLE, L.P., FALCON CABLE
10 SYSTEMS COMPANY II, L.P., AND
11 FALCON COMMUNITY VENTURES I,
12 L.P.

11 Complainants,

12 v.

13 CENTRAL LINCOLN PEOPLE'S UTILITY
14 DISTRICT,

15 Defendant.

Case No.

16 **CERTIFICATE OF SERVICE**

17 I hereby certify that true and correct copies of the following pleadings

- 18
- 19 • Complaint of Charter Communications Holding Company, LLC, *et al.* ("Charter")
20 against Central Lincoln People's Utility District ("CLPUD"), and accompanying exhibits
21 1 through 5.
 - 22 • Charter's Motion For Emergency Interim Relief, accompanying exhibits 1 through 14,
23 and Declarations of Frank Antonovich and Gary Lee in support of Charter's Motion.
 - 24 • Motion for Admission *Pro Hac Vice*, and accompanying Declaration of T. Scott
25 Thompson in support.

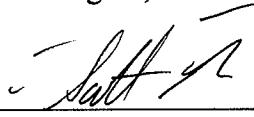
26 were served via e-mail transmission, and by FedEx in sealed envelopes upon the following:

1
2
3
4
5
6
7

Paul Davies General Manager Central Lincoln People's Utility District 2129 N. Coast Hwy Newport, OR 97365	
Peter Gintner Macpherson, Gintner, Gordon & Diaz 423 North Coast Highway P.O. Box 1270 Newport, OR 97365	

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

Dated this 6th day of January, 2006, at Washington, D.C.



T. Scott Thompson
Counsel for Charter