

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of the Joint Application of )	
Great Plains Energy Incorporated, Kansas )	Case No. EM-2007-0374
City Power & Light Company, and Aquila, )	
Inc. for Approval of the Merger of Aquila, )	
Inc. with a Subsidiary of Great Plains Energy )	
Incorporated and for Other Related Relief )	
)	

**MOTION REQUEST FOR WITHDRAWAL OF REPRESENTATION  
AND FOR LEAVE TO APPEAR PRO HAC VICE**

COMES NOW, Amy M. Danneil, counsel for the City of Kansas City, Missouri, pursuant to 4 CSR 240-2.040(6) and Missouri Supreme Court Rule 4-1.16, of the firm Kamlet Shepherd & Reichert, LLP, hereby requests to withdraw as counsel of record respectfully show the Commission the following:

1. Movant has conferred with the City of Kansas City, Missouri who does not object or oppose the changes sought herein.
2. Lukas B. Staks, of the firm Kamlet Shepherd & Reichert, LLP, is entering his Motion for Leave to Appear Pro Hac Vice to the Commission.
3. Willie E. Shepherd, Raymond L. Gifford, and Adam M. Peters, of the firm Kamlet Shepherd & Reichert, LLP, remain as counsel for the City of Kansas City, Missouri.
4. Movant has designated attorney Mark W. Comley, of Newman, Comley & Ruth P.C., as associate counsel with authority to act as attorney of record for all purposes. Mark W. Comley is admitted to practice before and is a member in good standing of the Bar of the State of Missouri and maintains an office in the State of Missouri.
5. Movant attaches her verification to this Motion.

COMES NOW, Lukas B. Staks, counsel for the City of Kansas City, Missouri, pursuant to 4 CSR 240-2.040(3)(C) and Missouri Supreme Court Rules 6.01(m) and 9.03, and for his Motion for Leave to Appear Pro Hac Vice respectfully show the Commission the following:

1. Movant is not currently admitted to practice in the State of Missouri.
2. Movant is a member in good standing of the Bar of the State of Colorado.
3. Movant represents that he will abide by the Federal Rules of Civil Procedure and the governing Rules of the Missouri Public Service Commission, as well as the Rules of Professional Conduct as set forth in Rule 4 and agree to be subject to discipline by the courts of the State of Missouri.
4. Neither Movant nor any member of Movants' firm have been disbarred or suspended by a court of record or by a state bar association, and there are no pending disciplinary proceedings against Movant.
5. Additionally, Movant is fully familiar with the facts and circumstances of this case and possess substantial knowledge concerning the business of the City of Kansas City. By reason of the attorney/client relationship Movant has with the City of Kansas City, the City of Kansas City believes Movants' participation in this case would substantially assist in this proceeding before the Commission and would serve the City of Kansas City's best interests.
6. Movant has designated attorney Mark W. Comley, of Newman, Comley & Ruth P.C., as associate counsel with authority to act as attorney of record for all purposes. Mark W. Comley is admitted to practice before and is a member in good standing of the Bar of the State of Missouri and maintains an office in the State of Missouri.
7. Movant attaches his verification to this Motion.

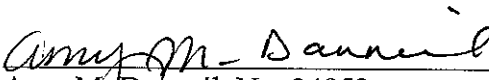
8. Movant attaches his receipt evidencing payment of the enrollment fee required under Rule 6.01 to this Motion.

WHEREFORE, PREMISES CONSIDERED, Movants respectfully request the Commission to enter an Order granting this Motion for Withdrawal of Representation and for Leave to Appear Pro Hac Vice for the purpose of representing the City of Kansas City in the above-entitled and numbered case.

DATED this 18 day of March, 2008.

Respectfully submitted,

  
Lukas B. Staks, No. 37853

  
Amy M. Danneil, No. 34952

KAMLET SHEPHERD & REICHERT, LLP  
1515 Arapahoe Street, Tower 1, Suite 1600  
Denver, Colorado 80202  
Phone: 303.825.4200  
Fax: 303.825.1185  
Email: lstaks@ksrlaw.com  
adanneil@ksrlaw.com

Attorneys for the City of Kansas City

**VERIFICATION**

STATE OF COLORADO     )  
  ) ss:  
COUNTY OF DENVER     )

I, AMY M. DANNEIL, being first duly sworn, hereby certify that I have read the foregoing **MOTION FOR WITHDRAWAL OF REPRESENTATION AND FOR LEAVE TO APPEAR PRO HAC VICE** and state that the facts alleged therein are true and correct to the best of my knowledge, information and belief.

*Amy M. Danneil*  
Amy M. Danneil

Subscribed and sworn to before me this 18<sup>th</sup> day of March, 2008, by AMY M. DANNEIL.

Witness my hand and official seal.

My Commission Expires: JUNE 23, 2011.

*Debra Ann Foulke*  
Notary Public

[SEAL]



**VERIFICATION**

STATE OF COLORADO     )  
  ) ss:  
COUNTY OF DENVER     )

I, LUKAS B. STAKS, being first duly sworn, hereby certify that I have read the foregoing **MOTION FOR WITHDRAWAL OF REPRESENTATION AND FOR LEAVE TO APPEAR PRO HAC VICE** and state that the facts alleged therein are true and correct to the best of my knowledge, information and belief.

*Lukas Staks*  
Lukas B. Staks

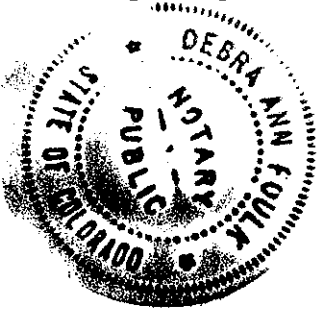
Subscribed and sworn to before me this 18<sup>th</sup> day of March, 2008, by LUKAS B. STAKS.

Witness my hand and official seal.

My Commission Expires: JUNE 23, 2011

*Debra Ann Foulk*  
Notary Public

[SEAL]



### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 20th day of March, 2008, the foregoing **MOTION FOR WITHDRAWAL OF REPRESENTATION AND FOR LEAVE TO APPEAR PRO HAC VICE** was sent via email to the following:

Alan Robbins	arobbins@jsslaw.com
Allen Garner	agarner@indepmo.org
Bill Riggins	bill.riggins@kcpl.com
Carl Lumley	clumley@lawfirmemail.com
Cindy Reams Martin	crmlaw@swbell.net
Curtis Blanc	Curtis.Blanc@kcpl.com
David Woodsmall	dwoodsmall@fcplaw.com
Dayla Bishop Schwartz	dschwartz@indepmo.org
Debra Moore	dmoore@casscounty.com
Debra Roby	droby@jsslaw.com
James C. Swearngen	lrackers@brydonlaw.com
James R. Waers	jrjw@blake-uhlig.com
Jane Williams	jlw@blake-uhlig.com
John Coffman	john@johncoffman.net
Karl Zobrist	kzobrist@sonnenschein.com
Leland Curtis	lcurtis@lawfirmemail.com
Mark English	mark.english@kcpl.com
Mary Ann Young	MYoung0654@aol.com
Matthew Uhrig	muhrig_lakelaw@earthlink.net
Office of Public Counsel	opcservice@ded.mo.gov
Paul DeFord	pdeford@lathropgage.com
Paul Boudreau	paulb@bydonlaw.com
Renee Parsons	renee.parsons@aquila.com
Robert Handley	Colleen.Fetz@lees-summit.mo.us
Roger Steiner	rsteiner@sonnenschein.com
Brent Stewart	Stewart499@aol.com
Stuart Conrad	stucon@fcplaw.com
William Steinmeier	wds@wdspsc.com
Jim Fischer	JFischerPC@aol.com
Paul Jones	pnjones@doeal.gov
Lewis Campbell	lcampbell4@comcast.net

/s/ Mark W. Comley

Mark W. Comley



THOMAS F. SIMON  
CLERK

**CLERK OF THE SUPREME COURT**  
**STATE OF MISSOURI**  
**POST OFFICE BOX 150**  
**JEFFERSON CITY, MISSOURI**  
**65102**

TELEPHONE  
(573) 751-4144

March 13, 2008

This will hereby acknowledge receipt of \$100 as required by Rule 6.01(m) for Lukas B. Staks appearing in In the Matter of the Joint Application of Great Plains Energy Incorporated, et al., for approval of the Merger of Aquila, Inc., etc., Case No. EM-2007-0374 to be filed with the Missouri Public Service Commission.

A handwritten signature in black ink, appearing to read "Thomas F. Simon", with a large, stylized "P" or "S" flourish to the right.

Thomas F. Simon, Clerk