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

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In the Matter of the Application of The Empire District Electric Company for Approval of Its Customer Savings Plan.

File No. EO-2018-0092

## MOTION TO ADMIT PRO HAC VICE

COMES NOW Diana C. Carter, of the law firm Brydon, Swearengen & England, P.C., pursuant to Missouri Supreme Court Rule 9.03, and requests an order allowing Sarah Baring Knowlton, an out-of-state attorney, to appear *pro hac vice* in this cause on behalf of The Empire District Electric Company ("Empire"). In support of this motion, it is respectfully stated as follows to the Missouri Public Service Commission ("Commission"):

1. Ms. Knowlton is employed by Liberty Utilities, and has a business address of 116 North Main Street, Concord, NH, 03301.

2. Ms. Knowlton is a member in good standing of the New Hampshire bar and is admitted to practice before the following courts: Fulton County Superior Court (Georgia); Supreme Court, State of Georgia; Supreme Court, State of New Hampshire; United States District Court, District of New Hampshire; United States Court of Appeals, First Circuit; Supreme Judicial Court, State of Maine; and Supreme Judicial Court of Commonwealth of Massachusetts.

3. Ms. Knowlton is not under suspension or disbarment in any state; neither Ms. Knowlton nor any other attorney employed by and practicing at Liberty Utilities is disqualified to appear before any court.

4. Ms. Knowlton agrees to comply with the Rules of Professional Conduct as set forth in Mo. Sup. Ct. Rule. 4, and acknowledges that she is subject to discipline by the courts of this State so long as she is practicing in this State. 5. Ms. Knowlton further agrees to associate herself with the undersigned lawyers, who are Missouri-licensed attorneys and resident attorneys of Missouri, for the duration of the above-captioned matter, and that such lawyers will continue to accept service of pleadings on behalf of Empire.

6. A receipt for payment of the fee required by Missouri Supreme Court Rule 6.01 is attached hereto.

WHEREFORE, Empire requests an order allowing Sarah Baring Knowlton, an out-ofstate attorney, to appear *pro hac vice* in this cause.

> /s/ Diana C. Carter Diana C. Carter MBE #50527 Dean L. Cooper MBE #36592 BRYDON, SWEARENGEN & ENGLAND P.C. 312 E. Capitol Avenue P. O. Box 456 Jefferson City, MO 65102 (573) 635-7166 dcarter@brydonlaw.com dcooper@brydonlaw.com

## **CERTIFICATE OF SERVICE**

I hereby certify that the above and foregoing document was filed in EFIS on this 9<sup>th</sup> day of January, 2018, with notice of the same being sent to all counsel of record.

/s/ Diana C. Carter\_\_\_\_\_