

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

In the Matter of Notification of ETC Name Change            )  
and Pro Forma Transfer of Control and Assignment        )  
Involving United Services, Inc. to United Fiber, LLC     )  
d/b/a United Fiber MO, LLC                                        )  
**File No. DN-2024-0213**

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL**

**COMES NOW** Whitney Scurlock, Chief Deputy Counsel, and hereby respectfully requests leave to withdraw as counsel for the Staff of the Missouri Public Service Commission (Staff) in the above-captioned matter. Effective April 8, 2024, I resigned my position in Staff Counsel’s Office. The Commission’s Staff will continue to be represented by a member of the Staff Counsel’s office assigned to this case.

**WHEREFORE**, I respectfully submit this *Motion for Leave to Withdraw as Counsel* for the Commission’s information and consideration.

Respectfully submitted,

**/s/ Whitney Payne**  
Whitney Payne  
Senior Counsel  
Missouri Bar No. 64078  
Attorney for the Staff of the  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102  
(573) 751-7434 (Telephone)  
(573) 751-9285 (Fax)  
[whitney.scurlock@psc.mo.gov](mailto:whitney.scurlock@psc.mo.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 9<sup>th</sup> day of April, 2024, to all counsel of record.

**/s/ Whitney Payne**