

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

In the Matter of the Application of Network)
Innovations, LLC d/b/a NITEL for Registration)
to Provide Interconnected Voice over Internet)
Protocol Service)

File No. DA-2024-0259

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

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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 9th day of April, 2024, to all counsel of record.

/s/ Whitney Payne