

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

In the Matter of the Request of The Empire )  
District Electric Company d/b/a Liberty for )  
Authority to File Tariffs Increasing Rates ) Case No. ER-2024-0261  
For Electric Service Provided to Customers )  
In its Missouri Service Area )

**MOTION FOR ADMISSION PRO HAC VICE**

Lindsey W. Ingram III, Monica H. Braun, W. Duncan Crosby III, and Matthew R. Parsons pursuant to 20 CSR 4240-2.040(3)(C) and Missouri Supreme Court Rules 6.01(n) and 9.03, move the Missouri Public Service Commission (“Commission”) for leave to be permitted to appear and participate in the above-captioned proceeding. In support of this Motion for Admission Pro Hac Vice, Mr. Ingram, Ms. Braun, Mr. Crosby, and Mr. Parsons respectfully state the following:

1. Mr. Ingram, Ms. Braun, and Mr. Parsons are attorneys with the firm of Stoll Keenon Ogden, PLLC, located at 300 West Vine Street, Suite 2100, Lexington, Kentucky 40507. Mr. Crosby is an attorney with the firm of Stoll Keenon Ogden, PLLC, located at 400 West Market Street, Suite 2700, Louisville, Kentucky 40202. Mr. Ingram, Ms. Braun, Mr. Crosby, and Mr. Parsons wish to represent The Empire District Electric Company d/b/a Liberty (“Liberty”) *pro hac vice* in this proceeding.

2. Mr. Ingram is a member in good standing of the Kentucky Bar under admission number 86026. Mr. Ingram is also admitted to practice before the United States Court of Appeals for the Fourth Circuit, United States Court of Appeals for the Sixth Circuit, the United States District Court for the Eastern District of Kentucky, and the United States District Court for the Western District of Kentucky. Mr. Ingram has never been subject to disciplinary proceedings of any kind.

3. Ms. Braun is a member in good standing of the Kentucky Bar under admission number 93058. Ms. Braun is also admitted to practice before the United States Tax Court and the United States Supreme Court. Ms. Braun has never been subject to disciplinary proceedings of any kind.

4. Mr. Crosby is a member in good standing of the Kentucky Bar under admission number 89805. Mr. Crosby is also admitted to practice before the United States District Court for the Western District of Kentucky. Mr. Crosby has never been subject to disciplinary proceedings of any kind.

5. Mr. Parsons is a member in good standing of the Kentucky Bar under admission number 92641. Mr. Parsons is also admitted to practice before the United States Court of Appeals for the Sixth Circuit, the United States District Court for the Eastern District of Kentucky, the United States District Court for the Western District of Kentucky, and the United States District Court for the District of Minnesota. Mr. Parsons has never been subject to disciplinary proceedings of any kind.

6. None of Mr. Ingram, Ms. Braun, Mr. Crosby, or Mr. Parsons, nor any member of Stoll Keenon Odgen PLLC, is under suspension or disbarment, nor is any member of Stoll Keenon Odgen PLLC disqualified to appear before the Missouri Public Service Commission or any court.

7. Pursuant to Missouri Supreme Court Rule 6.01(n), a fee of \$1,640 has been paid to the Clerk of the Missouri Supreme Court, and the certificates attached as Exhibit A were issued on July 11 and 12, 2024, by the Clerk of the Supreme Court.

8. Mr. Ingram, Ms. Braun, Mr. Crosby, and Mr. Parsons are associated in this matter with Diana C. Carter, Director of Legal Services – Liberty Central Region, 428 E. Capitol Avenue, Suite 303, Jefferson City, Missouri, 65101. Ms. Carter is a member in good standing of the

Missouri Bar and is qualified to practice before this Commission pursuant to 20 CSR 4240-2.040(3)(A). Mr. Ingram, Ms. Braun, Mr. Crosby, and Mr. Parsons will be co-counsel in this matter, along with Ms. Carter and Jermaine Grubbs. Ms. Carter and Ms. Grubbs entered their appearances on behalf of Liberty in this proceeding by filing a Notice of Intended Case Filing on March 25, 2024.

9. If this motion to appear *pro hac vice* is granted, Mr. Ingram, Ms. Braun, Mr. Crosby, and Mr. Parsons agree to abide by the Rules of the Commission, including all disciplinary rules, and to notify the Commission immediately of any matter affecting their standing at the bar of any court.

10. Mr. Ingram, Ms. Braun, Mr. Crosby, and Mr. Parsons respectfully request to be added to the service list for this proceeding, with electronic service preferred.

For the foregoing reasons, Lindsey W. Ingram III, Monica H. Braun, W. Duncan Crosby III, and Matthew R. Parsons respectfully request that this motion for admission *pro hac vice* be granted.

Respectfully submitted,

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Attorneys for The Empire District Electric Company  
d/b/a Liberty

### **CERTIFICATE OF SERVICE**

I hereby certify that the above document was filed in EFIS on this 23rd day of July, 2024, with notification of the same being sent to all counsel of record, and I further certify that the above document was sent by electronic transmission to the Staff of the Commission and the Office of the Public Counsel.

/s/ Diana C. Carter

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The Empire District Electric Company d/b/a Liberty