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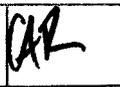
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**BEFORE THE ARIZONA CORPORATION COMMISSION**

**COMMISSIONERS**  
**MARC SPITZER - CHAIRMAN**  
**WILLIAM A. MUNDELL**  
**JEFF HATCH-MILLER**  
**MIKE GLEASON**  
**KRISTIN K. MAYES**

Arizona Corporation Commission  
**DOCKETED**

JUL 15 2004

DOCKETED BY 

IN THE MATTER OF THE PETITION OF DIECA ) DOCKET NO. T-03632A-04-0425  
COMMUNICATIONS, INC. dba COVAD )  
COMMUNICATIONS COMPANY FOR )  
ARBITRATION OF AN INTERCONNECTION )  
AGREEMENT WITH QWEST CORPORATION. )

**MOTION AND CONSENT OF MICHAEL W. PATTEN FOR  
PRO HAC VICE ADMISSION OF KAREN SHORESMAN FRAME  
ON BEHALF OF DIECA COMMUNICATIONS, INC. dba COVAD  
COMMUNICATIONS COMPANY**

Pursuant to Rule 33(c) and (d) Rules of Supreme Court, Michael W. Patten moves the Arizona Corporation Commission to admit Karen S. Frame as counsel pro hac vice in this action.

The following exhibits are attached here to pursuant to Rule 33(c) and (d):

1. The Original Verified Application;
2. The Certificate of Good Standing; and
3. The State Bar of Arizona Notice of Receipt.

The filing fee as required under Rule 33(d) has been submitted to the State Bar of Arizona. Michael W. Patten hereby agrees to serve as designated local counsel for the above-captioned docket.

**RECEIVED**  
2004 JUL 15 1 P 4: 18  
AZ CORP COMMISSION  
DOCUMENT CONTROL

**ROSHKA HEYMAN & DeWULF, PLC**  
ONE ARIZONA CENTER  
400 EAST VAN BUREN STREET - SUITE 800  
PHOENIX, ARIZONA 85004  
TELEPHONE NO 602-256-6100  
FACSIMILE 602-256-6800

1 RESPECTFULLY SUBMITTED this 15<sup>th</sup> day of July, 2004.  
2

3 By 

4 Michael W. Patten  
5 ROSHKA HEYMAN & DEWULF, PLC  
6 One Arizona Center  
7 400 East Van Buren Street, Suite 800  
8 Phoenix, Arizona 85004  
9 (602) 256-6100

10 and

11 Karen Shoresman Frame  
12 Senior Counsel  
13 Covad Communications Company  
14 7901 Lowry Boulevard  
15 Denver, Colorado 80230  
16 Phone: 720-670-1069

17 Attorneys for DIECA Communications, Inc., d/b/a Covad  
18 Communications Company

19 Original and 13 copies of the foregoing  
20 filed this 15<sup>th</sup> day of July, 2004 with:

21 Docket Control  
22 Arizona Corporation Commission  
23 1200 West Washington Street  
24 Phoenix, Arizona 85007

25 Copy of the foregoing hand-delivered/mailed  
26 this 15<sup>th</sup> day of July, 2004 to:

27 Ms. Lyn Farmer  
Chief Administrative Law Judge  
Hearing Division  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007

**ROSHKA HEYMAN & DEWULF, PLC**  
ONE ARIZONA CENTER  
400 EAST VAN BUREN STREET - SUITE 800  
PHOENIX, ARIZONA 85004  
TELEPHONE NO 602-256-6100  
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Denver, Colorado 80209  
  
Norman G. Curtright  
Corporate Counsel  
Qwest Corporation  
1801 California, Suite 4900  
Denver, Colorado 80202  
  
John Devaney  
Perkins Coie, LLP  
607 Fourteenth Street, N.W.  
Suite 800  
Washington, D.C. 20005

By Mary Ippolito

1  
2  
3 **Arizona Corporation Commission**

4 DIECA Communication Inc., )  
5 Plaintiff, )  
6 v. )  
7 Defendant. )

CASE # T-03632A-04

SBA App # 1001221

**NOTICE OF RECEIPT OF COMPLETE APPLICATION**

8  
9 NOTICE IS HEREBY given by THE STATE BAR OF ARIZONA that it has received the verified application and fee from Karen Shoresman Frame.

10 In addition to this application, applicant has made the following applications to appear pro hac vice, pursuant to Rule33 (d), within the previous three (3) years:

11

Title of Matter	Court/Agency	Date	Granted?	
_____	_____	_____	<input type="checkbox"/> yes	<input type="checkbox"/> no
_____	_____	_____	<input type="checkbox"/> yes	<input type="checkbox"/> no
_____	_____	_____	<input type="checkbox"/> yes	<input type="checkbox"/> no
_____	_____	_____	<input type="checkbox"/> yes	<input type="checkbox"/> no

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16

17 Exhibit A, the original verified application and Exhibit B, the original Certificate(s) of Good Standing are attached hereto.

18  
19 DATED this 13th day of July, 2004

20   
21 Penny Lewis  
22 Resource Center  
23 State Bar of Arizona

24 Original Mailed on  
25 This 13th day of July, 2004 to:  
Michael Patten  
400 E Van Buren St Suite 800  
Phoenix, AZ 85004

**TO PRINT**



For Official Use Only  
App# 1001221  
Pro Hac ID # P152528

**NONRESIDENT ATTORNEY  
PRO HAC VICE APPLICATION**

Name: Karen Shoresman Frame

Residence Address: 1001 Neon Forest Circle, Longmont, Colorado 80504

Office Address: 7901 Lowry Blvd., Denver, CO 80230

Telephone: 720-670-1069 Fax: 720-670-3350

Title of cause or case where applicant seeks to appear: In the Matter of the Petition of DIECA Communication

Docket Number: T-03632A-04

Court, Board, or Administrative Agency: Arizona Corporation Commission

Party on whose behalf applicant seeks to appear: DIECA Communications Inc., d/b/a Covad Communications

Courts to Which Applicant Has Been Admitted:	Date of Admission:	Bar Number:
<u>All Colorado State Courts</u>	<u>10-21-93</u>	<u>23187</u>
<u>All Illinois State Courts</u>	<u>11-09-89</u>	<u>6201220</u>
<u>All Washington State Courts</u>	<u>07-08-03</u>	<u>33859</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

Applicant is a member in good standing in such courts.

Applicant is not currently disbarred or suspended in any court.

Applicant  is /  is not (select one) currently subject to any pending disciplinary proceeding or investigation by any court, agency or organization authorized to discipline attorneys at law.

Jurisdiction(s) Where Discipline Matter Pending:	Nature of Matter Under Investigation:	Name / Address of Disciplinary Authority:
<u>N/A</u>	_____	_____
_____	_____	_____
_____	_____	_____

Applicant  has /  has not (select one) been disciplined by any court, agency or organization authorized to discipline attorneys at law.

In the preceding three (3) years, applicant has filed applications to appear as counsel under Rule 33, Arizona Rules of Supreme Court in the following:

Title of Matter:	Docket #:	Court or Agency:	Application Granted? (Y/N)
<u>Triennial Review Order Proceedings</u>	<u>T-00000A-03</u>	<u>ACC</u>	<u>N/A</u>
_____	_____	_____	<u>N/A</u>
_____	_____	_____	<u>N/A</u>
_____	_____	_____	<u>N/A</u>

Name of local counsel: Michael W. Patten, Esquire of Roshka Hayman & DeWulf, PLC

State Bar of Arizona Number: 009796

Address: One Arizona Center, 400 East Van Buren Street, Suite 800, Phoenix, AZ 85004

Telephone: 602-256-6100 Fax: 602-256-6800

Name(s) of each party in this cause and name and address of all counsel of record:

Party:	Counsel of Record:	Address:
<u>Qwest Corporation</u>	<u>Norman Curtright</u>	<u>1801 California, Ste. 4900, Denver, CO 80202</u>
<u>Qwest Corporation</u>	<u>John Devaney, Perkins Coie, L</u>	<u>607 14th St. N.W., Ste. 800, Washington D.C.</u>
<u>Qwest Corporation</u>	<u>Mary Rose Hughes, Perkins Co</u>	<u>607 14th St. N.W., Ste. 800, Washington D.C.</u>

Applicant is including with this application a nonrefundable application fee, payable to the State Bar of Arizona, in the amount of \$~~348.50~~ 369.75

This case or cause  is /  is not (select one) a related or consolidated matter for which applicant has previously applied to appear pro hac vice in Arizona. If this matter is a related or consolidated with any previous application, applicant certifies the following:

Applicant certifies the following:

1. Applicant shall be subject to the jurisdiction of the courts and agencies of the State of Arizona and to the State Bar of Arizona with respect to the law of this state governing the conduct of attorneys to the same extent as an active member of the State Bar of Arizona, as provided in Rule 46(b) Rules of the Supreme Court.
2. Applicant will review and comply with appropriate rules of procedure as required in the underlying cause.
3. Applicant understands and shall comply with the standards of conduct required of members of the State Bar of Arizona.

Verification

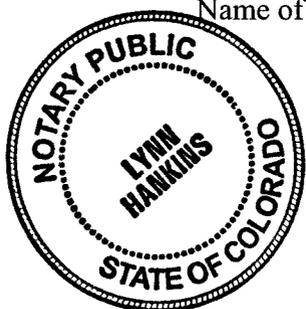
STATE OF Colorado )  
County of City & County of Denver ) ss.

I, the Applicant, swear that all statements in the application are true, correct and complete to the best of my knowledge and belief.

Dated: 7.1.04

Applicant's signature Karen Shoesman Frame

SUBSCRIBED AND SWORN TO before me this 1<sup>st</sup> day of July, 2004, by  
Karen Shoesman Frame  
Name of Applicant



Lynn Hankins  
Notary Public

My commission expires 4/11/06

**NOTE – As the application requires original signatures of the applicant and notary, this application cannot be filed electronically. Please submit all documents and fees by mail to:**

State Bar of Arizona  
Pro Hac Vice  
111 West Monroe, Suite 1800  
Phoenix, AZ 85003

For further information, please contact our Membership Records Department at (602) 340-7239

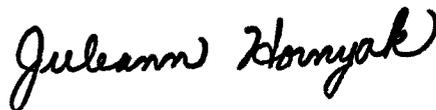
# **Certificate of Admission To the Bar of Illinois**

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Karen Shoresman Frame

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 9, 1989, and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto placed my hand and affixed the seal of said Supreme Court, at Springfield, in said State, this Wednesday, November 05, 2003.



Clerk

**IN THE SUPREME COURT OF THE STATE OF WASHINGTON**

IN THE MATTER OF THE ADMISSION

BAR # 33859

OF

**CERTIFICATE OF GOOD**

KAREN SHORESMAN FRAME

**STANDING**

TO PRACTICE IN THE COURTS OF THIS STATE.

I, C.J. Merritt, Clerk of the Supreme Court of the State of Washington, hereby certify

**KAREN SHORESMAN FRAME**

was regularly admitted to practice as an Attorney and Counselor at Law in the Supreme Court and all the Courts of the State of Washington, on July 8, 2003, and is now and has been continuously since that date an attorney in good standing in said Court.

IN TESTIMONY WHEREOF, I have  
hereunto set my hand and affixed  
the seal of said Court this  
3<sup>rd</sup> day of November, 2003

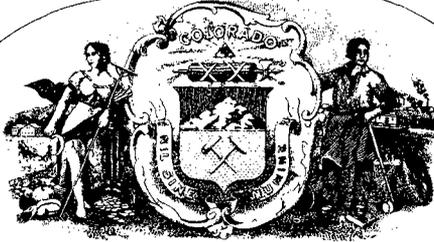


A handwritten signature in black ink, appearing to read "C.J. Merritt". The signature is written in a cursive style with a long horizontal stroke extending to the right.

C.J. MERRITT, SUPREME COURT CLERK

WASHINGTON STATE SUPREME COURT

# SUPREME COURT



## State of Colorado,

STATE OF COLORADO, ss:

I, Mac V. Danford Clerk of the Supreme Court of the State of Colorado, do hereby certify that

Karen Shoresman Frame

has been duly licensed and admitted to practice as an

*ATTORNEY AND COUNSELOR AT LAW*

within this State; and that his/her name appears upon the Roll of Attorneys and Counselors at Law in my office of date the 21<sup>st</sup>

day of October A. D. 1993 and that at the date hereof the said Karen Shoresman Frame

is in good standing at this Bar.



IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed the Seal of said Supreme Court, at Denver, in said State, this

3<sup>rd</sup> day of November A. D. 2003

Mac V. Danford

Clerk

By D. Wood & Espinoza

Deputy Clerk