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BEFORE THE ARIZONA CORPORATION COMMISSION

JEFF HATCH-MILLER
Chairman

WILLIAM MUNDELL
Commissioner

MARC SPITZER
Commissioner

MIKE GLEASON
Commissioner

KRISTIN K. MAYES
Commissioner

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AZ CORP COMMISSION
DOCUMENT CONTROL

LEVEL 3 COMMUNICATIONS, LLC,)

Complainant,

Docket No. T-03654A-05-0415
T-01051B-05-0415

vs.

QWEST CORPORATION,

Respondent.

MOTION AND CONSENT OF
LOCAL COUNSEL FOR PRO HAC VICE
ADMISSION OF VICTORIA RUTH MANDELL

Michael T. Hallam, pursuant to Rule 33(c) and (d) Rules of the Supreme Court,
moves the Commission Hearing Division to admit Victoria Ruth Mandell as counsel pro
hac vice in this action.

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Pursuant to Rule 33(c) and (d) Rules of the Supreme Court, the following exhibits are attached hereto:

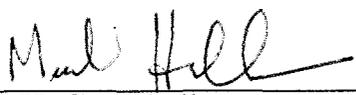
1. the original Verified Application;
2. the original Certificate of Good Standing; and
3. the State Bar of Arizona Notice of Receipt of Complete Application.

The filing fee as required by Rule 33(d) has been submitted to the State Bar of Arizona. Michael T. Hallam hereby agrees to serve as designated local counsel for the subject case.

A proposed order admitting Victoria Ruth Mandell accompanies this motion.

RESPECTFULLY SUBMITTED this 22nd day of July, 2005.

LEWIS AND ROCA LLP



Thomas H. Campbell
Michael T. Hallam
40 North Central Avenue
Phoenix, AZ 85004

Attorneys for Level 3 Communications, LLC

ORIGINAL and fifteen (15) copies of the foregoing filed this 22nd day of July, 2005, with:

The Arizona Corporation Commission
Utilities Division – Docket Control
1200 W. Washington Street
Phoenix, Arizona 85007

Copy of the foregoing hand-delivered this 22nd day of July, 2005, to:

Christopher C. Kempley, Chief Counsel
Legal Department
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

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Ernest G. Johnson, Director
Utilities Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

Jane Rodda, Administrative Law Judge
Hearing Divisions
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007



STATE BAR
of ARIZONA

For Official Use Only

App# 1004125

Pro Hac ID # D1502358

NONRESIDENT ATTORNEY
PRO HAC VICE APPLICATION

Name: Victoria Ruth Mandell

Residence Address: 240 32nd Street, Boulder, CO 80305

Office Address: 1025 Eldorado Blvd., Broomfield, CO 80021

Telephone: 720-888-2439 Fax: 720-888-5134

Title of cause or case where applicant seeks to appear: In the Matter of the Formal Complaint against Qwest Corporation filed by Level 3 Communications, LLC
Docket Number: T-03654A-05-0415; T-01051B-05-0415

Court, Board, or Administrative Agency: Arizona Corporation Commission

Party on whose behalf applicant seeks to appear: Level 3 Communications, LLC

Courts to Which Applicant Has Been Admitted:	Date of Admission:	Bar Number:
<u>Colorado Supreme Court</u>	<u>9/9/88</u>	<u>17900</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:
_____	_____	_____
_____	_____	_____
_____	_____	_____

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)
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

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JUL 01 2005
STATE BAR OF ARIZONA

Name of local counsel: Michael Hallam

State Bar of Arizona Number: 018382

Address: Lewis & Roca, LLP, 40 North Central Avenue, Phoenix, AZ 85004

Telephone: 602-262-5311 Fax: 602-734-3841

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

Party:	Counsel of Record:	Address:
<u>Qwest Corp.</u>	<u>Timothy Berg</u>	<u>Fennemore Craig, 3003 N. Central Ave., Phoenix, AZ</u>
<u>Qwest Corp.</u>	<u>Theresa Dwyer</u>	<u>same as above</u> 85102
<u>Qwest Corp.</u>	<u>Norman G. Curtright</u>	<u>Qwest Corp., 4041 N. Central Ave., Phoenix, AZ 85102</u>

Applicant is including with this application a nonrefundable application fee, payable to the State Bar of Arizona, in the amount of \$391.00.

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

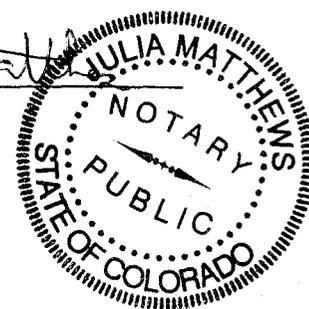
STATE OF COLORADO)
County of Broomfield) ss.

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

Dated: 6/27/05 Applicant's signature Vicky Mandell

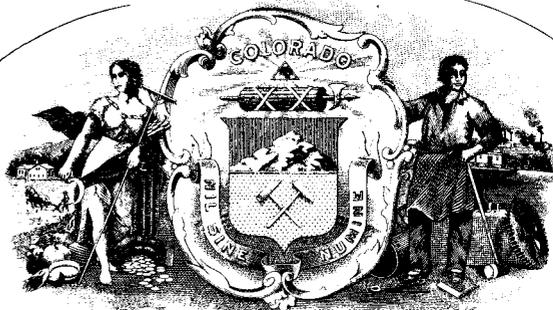
SUBSCRIBED AND SWORN TO before me this 27 day of June, 2005, by
Vicky Mandell
Name of Applicant

Julia Matthews
Notary Public



My Commission Expires 11/15/07

SUPREME COURT



State of Colorado,

STATE OF COLORADO, ss:

I, Susan J. Festag Clerk of the Supreme Court of the State of Colorado, do hereby certify that

Victoria Ruth Mandell

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 27th

day of October A. D. 1988 and that at the date hereof

the said Victoria Ruth Mandell

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

22nd day of June A. D. 2005

Susan J. Festag

Clerk

By

Sharon H. Kanzler

Deputy Clerk



Arizona Corporation Commission

Level 3 Communications LLC,
Plaintiff,

v.

Qwest Corporation,
Defendant.

CASE # T-03654A

SBA App # 1001925

NOTICE OF RECEIPT OF
COMPLETE APPLICATION

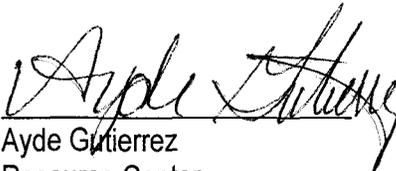
NOTICE IS HEREBY given by THE STATE BAR OF ARIZONA that it has
received the verified application and fee from Victoria Ruth Mandell.

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:

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

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

DATED this 08th day of July 2005


Ayde Gutierrez
Resource Center
State Bar of Arizona

Original Mailed on
This 08th day of July 2005 to:
Mr. Michael T. Hallam
40 N Central Ave
Phoenix, AZ 85004-4429

BEFORE THE ARIZONA CORPORATION COMMISSION

JEFF HATCH-MILLER
Chairman
WILLIAM MUNDELL
Commissioner
MARC SPITZER
Commissioner
MIKE GLEASON
Commissioner
KRISTIN K. MAYES
Commissioner

LEVEL 3 COMMUNICATIONS, LLC,)

Complainant,)

Docket No. T-03654A-05-0415
T-01051B-05-0415

vs.)

QWEST CORPORATION,)

Respondent.)

**ORDER FOR PRO HAC VICE
ADMISSION OF VICTORIA RUTH MANDELL**

Based upon the motion for admission Pro Hac Vice of Victoria Ruth Mandell and the consent to appear as local counsel by Michael T. Hallam,

IT IS HEREBY ORDERED that Victoria Ruth Mandell be admitted Pro Hac Vice as counsel for Level 3 Communications LLC in Docket No: T-03654A-05-0415 in the above-entitled matter.

DATED this ___ day of July, 2005.

Jane Rodda
Administrative Law Judge

