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**BEFORE THE ARIZONA CORPORATION COMMISSION**

JEFF HATCH-MILLER  
Chairman

WILLIAM A. MUNDELL  
Commissioner

MARC SPITZER  
Commissioner

MIKE GLEASON  
Commissioner

KRISTIN K. MAYES  
Commissioner

RECEIVED  
2005 SEP 15 P 4: 49  
AZ CORP COMMISSION  
DOCUMENT CONTROL

LEVEL 3 COMMUNICATIONS, LLC, )  
)  
Complainant, )  
vs. )  
)  
QWEST CORPORATION, )  
)  
Respondent. )

Docket Nos. T-01051B-05-0415  
T-03654A-05-0415

**MOTION AND CONSENT OF LOCAL COUNSEL  
FOR PRO HAC VICE ADMISSION OF GREGG STRUMBERGER**

Michael T. Hallam, pursuant to Rule 33(c) and (d) of the Rules of the Supreme Court, moves the Commission Hearing Division to admit Gregg Strumberger as counsel pro hac vice in this action on behalf of Level 3 Communications, LLC.

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 Certificates 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 Gregg Strumberger accompanies this motion.

RESPECTFULLY SUBMITTED this 16th day of September, 2005.

LEWIS AND ROCA LLP



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Thomas H. Campbell  
Michael T. Hallam  
40 N. Central Avenue  
Phoenix, Arizona 85004

Attorneys for Level 3 Communications

ORIGINAL and fifteen (15)  
copies of the foregoing filed this  
16th day of September, 2005, with:

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

1 COPY of the foregoing hand-delivered  
2 this 16th day of September, 2005 to:

3 Jane Rodda, Administrative Law Judge  
4 Hearing Division  
5 Arizona Corporation Commission  
6 1200 West Washington  
7 Phoenix, AZ 85007

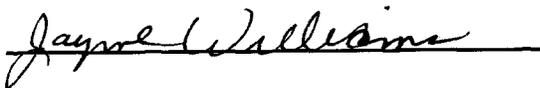
8 Maureen Scott, Counsel  
9 Legal Division  
10 Arizona Corporation Commission  
11 1200 West Washington  
12 Phoenix, AZ 85007

13 Ernest Johnson, Director  
14 Utilities Division  
15 Arizona Corporation Commission  
16 1200 West Washington  
17 Phoenix, AZ 85007

18 Copy of the foregoing mailed  
19 this 16th day of September, 2005, to:

20 Timothy Berg  
21 Theresa Dwyer  
22 Fennemore Craig, P.C.  
23 3003 N. Central Avenue  
24 Suite 2600  
25 Phoenix, AZ 85012  
26 Attorneys for Qwest Corporation

Norman G. Curtright  
Qwest Corporation  
4041 N. Central Avenue  
11th Floor  
Phoenix, AZ 85012  
Attorneys for Qwest Corporation



TO PRINT



For Official Use Only  
App# 1002057  
Pro Hac ID # P157094

NONRESIDENT ATTORNEY  
PRO HAC VICE APPLICATION

Name: Gregg Strumberger

Residence Address: 4821 W. 103 Avenue, Westminster, CO 80031

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

Telephone: 720-888-1780 Fax: 720-888-5134

In the Matter of the Formal Complaint against

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

Court, Board, or Administrative Agency: Arizona Corporate Commission LLC

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>Massachusetts</u>	<u>1999</u>	
<u>District of Columbia</u>	<u>2001</u>	<u>471606</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)
			N/A

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/Theresa Dwyer</u>	<u>Fennemore Craig, 3003 N. Central Avenue, Phoenix, AZ 85102</u>
<u>Qwest Corp.</u>	<u>Norman G. Curtright</u>	<u>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

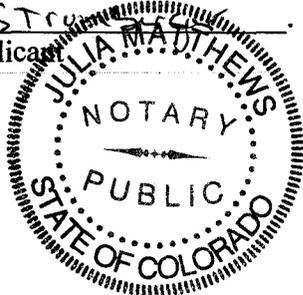
STATE OF Colorado )  
County of Broomfield ) ss.

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

Dated: \_\_\_\_\_ Applicant's signature [Signature]

SUBSCRIBED AND SWORN TO before me this 15<sup>th</sup> day of Sept, 2005, by

Gregory Str...  
Name of Applicant



[Signature]  
Notary Public

My Commission Expires 11/18/07

# COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

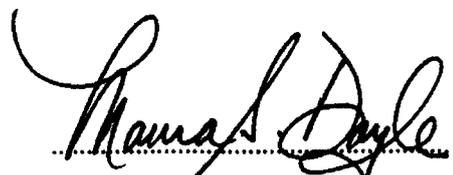
BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston within and for said County of Suffolk, on the **seventeenth** day of **December** A.D. **1999**, said Court being the highest Court of Record in said Commonwealth:

Gregg Strumberger

being found duly qualified in that behalf, and having taken and subscribed the oaths required by law, was admitted to practice as an Attorney, and, by virtue thereof, as a Counsellor at Law, in any of the Courts of the said Commonwealth: that said Attorney is at present a member of the Bar, and is in good standing according to the records of this Court\*.

In testimony whereof, I have hereunto set my hand and affixed the seal of said Court, this twenty-seventh day of June in the year of our Lord Two thousand and five.



  
MAURA S. DOYLE, Clerk

\* Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification.



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

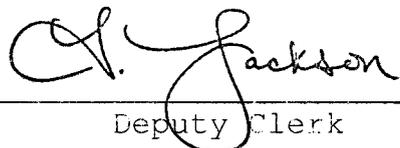
GREGG STRUMBERGER

---

was on the 9<sup>TH</sup> day of MARCH, 2001  
duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on August 24, 2005.

GARLAND PINKSTON, JR., CLERK

By:   
Deputy Clerk

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**Superior Court  
Arizona Corporate Commission**

Level 3 Communications, )  
Plaintiff, ) CASE # T-03654A-05-0415  
v. ) SBA App # 1002057  
Qwest Corporation, )  
Defendant. )  
**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 Gregg Strumberger.

In addition to this application, applicant has made the following applications to appear pro hac vice, pursuant to Rule 33 (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

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

DATED this 13<sup>th</sup> day of September 2005

  
Ayde Gutierrez  
Resource Center  
State Bar of Arizona

Original Mailed on  
This 13<sup>th</sup> day of September 2005 to:  
Mr. Michael T. Hallam  
40 N Central Ave  
Phoenix, AZ 85004-4429