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BEFORE THE ARIZONA CORPORATION COMMISSION

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Jeff Hatch-Miller, Chairman
William A Mundell
Marc Spitzer
Mike Gleason
Kristin K. Mayes

AZ CORP COMMISSION
DOCUMENT CONTROL

Docket No. T-01954B-05-0640

In the Matter of the Formal Complaint
Against Citizens Utilities Rural Company,
Inc. d/b/a Frontier Citizens Utilities Rural
Filed By Betty Bingaman

**MOTION TO PERMIT KEVIN SAVILLE,
ESQ. TO APPEAR *PRO HAC VICE*
PURSUANT TO RULE 33, RULES OF
SUPREME COURT**

Pursuant to Rule 33(c), Rules of the Supreme Court ("Rule 33(c)"), counsel of record, Robert J. Metli, Esq., Bar No. 018509, hereby moves for the admission of Kevin Saville, Esq. ("Mr. Saville"), Associate General Counsel for Citizens Communications Company, to appear *pro hac vice*, in the above-captioned matter. This Motion is supported by (1) Mr. Saville's original verified application; (2) the original certificate of good standing; and (3) the State Bar Notice of Receipt of Complete Application. Attached hereto as "Exhibit "A".

Mr. Saville is in good standing and currently eligible to practice in Minnesota Supreme Court – Minnesota State Courts; Federal District – District of Minnesota.

Mr. Saville is not currently suspended or disbarred in any court. Further, Mr. Saville shall associate the law firm of Snell & Wilmer, One Arizona Center, Phoenix, Arizona 85004, and specifically Robert J. Metli, Esq. as the designated member of the State Bar of Arizona with whom the Commission and opposing counsel may readily communicate regarding this Docket and upon whom papers shall be served unless otherwise dictated by the Commission.

///

Snell & Wilmer

LLP
LAW OFFICES
One Arizona Center, 400 E. Van Buren
Phoenix, Arizona 85004-2202
(602) 382-6000

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RESPECTFULLY SUBMITTED this 20 day of January, 2006.

CONSENT

I hereby consent to the following designation.

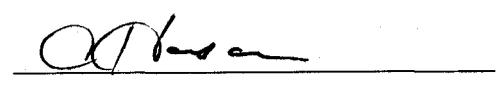
SNELL & WILMER L.L.P.

By 

Robert J. Metli
One Arizona Center
400 E. Van Buren
Phoenix, AZ 85004-2202
Attorneys for Citizens Utilities Rural Company, Inc.

Original and 13 copies filed with Docket Control
and copies mailed this 20 day of January, 2006, to:

- Betty Bingaman
11078 Alvis Rd. Box 145
Yucca, Arizona 86438
- Citizens Utilities Rural Company, Inc.
Curt Huttzell, State Reg. Mgr.
4 Triad Center
Salt Lake City, Utah 84180
- Lyn Farmer
Arizona Corporation Commission
1200 W. Washington
Phoenix, Arizona 85007-2927
- Ernest Johnson
Arizona Corporation Commission
1200 W. Washington
Phoenix, Arizona 85007-2927
- Chris Kempley
Arizona Corporation Commission
1200 W. Washington
Phoenix, Arizona 85007-2927



Snell & Wilmer

LLP
LAW OFFICES
One Arizona Center, 400 E. Van Buren
Phoenix, Arizona 85004-2202
(602) 382-6000

Bingaman
Exhibit A



| |
|-----------------------------|
| For Official Use Only |
| App# <u>1002274</u> |
| Pro Hac ID # <u>2142474</u> |

**NONRESIDENT ATTORNEY
PRO HAC VICE APPLICATION**

Name: Kevin J. Saville
 Residence Address: 1005 West Cove Lane, Minnestrista, Minnesota 55364
 Office Address: Citizens Communications, 2378 Wilshire Blvd., Mound, Minnesota 55364

Telephone: 952-491-5564 Fax: 952-491-5515

Title of cause or case where applicant seeks to appear: In the Matter of the Formal Complaint Against Citizens Utilities Rural Company, Inc. d/b/a Frontier Citizens Utilities Rural Filed by Betty Bingaman

Docket Number: Docket No. T-01954B-05-0640

Court, Board, or Administrative Agency: Arizona Corporation Commission

Party on whose behalf applicant seeks to appear: Citizens Utilities Rural Company, Inc.

| | | |
|---|--------------------|----------------|
| Courts to Which Applicant Has Been Admitted: | Date of Admission: | Bar Number: |
| <u>Minnesota Supreme Court - Minnesota State Courts</u> | <u>10/23/1992</u> | <u>0231563</u> |
| <u>Federal District Court - District of Minnesota</u> | <u>10/23/1992</u> | <u>0231563</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.

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State Bar of Arizona
Resource Center Department

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>In the Matter of the Petition of Autotel for Arbitration of an Interconnection Agreement with Citizens Communications Operating Companies of Arizona Pursuant to Section 252(b) of the Telecommunications Act of 1996</u> | <u>T-03234A-03-0188</u> | <u>Arizona Corporation Commission</u> | <u>Yes</u> |
| _____ | _____ | _____ | _____ |
| _____ | _____ | _____ | _____ |
| _____ | _____ | _____ | _____ |

Name of local counsel: Robert J. Metli
State Bar of Arizona Number: 018509
Address: One Arizona Center, Phoenix, Arizona 85004

Telephone : 602-382-6000 Fax: 602-382-6070

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

| Party: | Counsel of Record: | Address: |
|---------------------------|------------------------|---|
| <u>Betty Bingaman</u> | _____ | <u>11078 Alvis Road, P.O. Box 145, Yucca, Arizona 86438</u> |
| <u>Citizens Utilities</u> | <u>Robert J. Metli</u> | <u>One Arizona Center, Phoenix, AZ 85004</u> |
| <u>Rural Company,</u> | | |
| <u>Inc.</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 Minnesota
County of Hennepin 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: 1-13-06

Applicant's signature

Kevin Saville

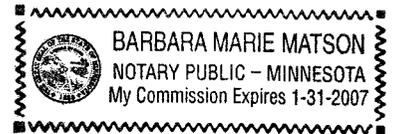
SUBSCRIBED AND SWORN TO before me this 13 day of Jan., 2006, by

KEVIN SAVILLE
Name of Applicant

Barbara Marie Matson
Notary Public

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
4201 N. 24th Street, Suite 200
Phoenix, AZ 85016-6288



For further information, please contact our Resource Center at 602-340-7239.

1 **Arizona Corporation Commission**

2
3 In the Matter of the formal complaint against
Citizens Utilities Rural Company, Inc)

Case # T-01954B-05-0640

4)
5)
6)
7)
SBA App # 1002279

**NOTICE OF RECEIPT OF
COMPLETE APPLICATION**

8 NOTICE IS HEREBY given by THE STATE BAR OF ARIZONA that it has
9 received the verified application and fee from Kevin J. Seville

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:

| Title of Matter | Court/Agency | Date | Granted? |
|---|-----------------------------------|------------|---|
| Telecommunication Act of 19996 | Arizona Corporation Commission | 07/17/2003 | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| Request of Autotel for Interconnection | Arizona Corporation Commission | | Pending |
| | | | |

14
15 Exhibit A, the original verified application and Exhibit B, the original Certificate(s) of
16 Good Standing are attached hereto.

17 DATED this 20th day of January 2006

18 
19 Mabel Ramirez
Resource Center
State Bar of Arizona

20 Original Mailed on this 20th day of January 2005 to:

21
22 Mr. Robert J. Metli
23 One Arizona Center
24 400 E Van Buren
25 Phoenix, AZ 85004

STATE OF MINNESOTA
IN SUPREME COURT

Certificate of Good Standing

This is to certify that the following attorney is in good standing.

KEVIN JOSEPH SAVILLE

was duly admitted to practice as an attorney and counselor at law in all the courts of this state on

October 23, 1992

Given under my hand and seal of this court on

January 12, 2006



Frederick K. Gritner

Frederick K. Gritner
Clerk of Appellate Courts

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BEFORE THE ARIZONA CORPORATION COMMISSION

Jeff Hatch-Miller, Chairman
William A Mundell
Marc Spitzer
Mike Gleason
Kristin K. Mayes

In the Matter of the Formal Complaint
Against Citizens Utilities Rural
Company, Inc. d/b/a Frontier Citizens
Utilities Rural Filed By Betty Bingaman

Docket No. T-01954B-05-0640

ORDER

Having considered the Application to Appear *Pro Hac Vice* submitted by Kevin Saville, Esq. ("Mr. Saville"), and good cause appearing therefore,

IT IS HEREBY ORDERED that Kevin Saville, Esq. may appear and practice before this Commission in the above-captioned Docket.

IT IS FURTHER ORDERED that the *Pro Hac Vice* status of Mr. Saville is valid for one (1) year from the date of entry below pursuant to Rule 33(c), Rules of the Supreme Court.

DATED this _____ day of January, 2006.

AMY BJELLAND
ADMINISTRATIVE LAW JUDGE

1 Original and 13 copies filed with Docket Control
and copies mailed this 20 day of January, 2006, to:

2 Betty Bingaman
3 11078 Alvis Rd. Box 145
4 Yucca, Arizona 86438

5 Citizens Utilities Rural Company, Inc.
6 Curt Huttzell, State Reg. Mgr.
7 4 Triad Center
8 Salt Lake City, Utah 84180

9 Lyn Farmer
10 Arizona Corporation Commission
11 1200 W. Washington
12 Phoenix, Arizona 85007-2927

13 Ernest Johnson
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