

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA

BELLSOUTH
TELECOMMUNICATIONS, INC.,

Case Number 4:99CV328-RH

Plaintiff,

vs.

AMERICAN COMMUNICATION SERVICES
OF JACKSONVILLE, INC. d/b/a e.spire
Communications; ACSI LOCAL SWITCHED
SERVICES, INC. d/b/a e.spire
Communications, Inc.; THE FLORIDA
PUBLIC SERVICE COMMISSION, THE
HONORABLE J. TERRY DEASON, in his
official capacity as a Commissioner of the
Florida Public Service Commission, THE
HONORABLE SUSAN F. CLARK, in her
official capacity as a Commissioner of the
Florida Public Service Commission, and THE
HONORABLE E. LEON JACOBS, JR., in his
official capacity as a Commissioner of the
Florida Public Service Commission,

Defendants.

MOTION TO APPEAR PRO HAC VICE

Raoul G. Cantero, III, Esq. and Jeffrey W. Blacher, Esq. of the law firm of

Adorno & Zeder, P.A., and Sean A. Lev of the law firm Kellogg, Huber, Hansen, Todd &

- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- MAS _____
- OPC _____
- PAI _____
- SEC I
- WAW _____
- OTH _____

DOCUMENT NUMBER-DATE

~~13449~~ NOV-28

FPSC-RECORDS/REPORTING

NOV 28 1999

Evens, P.L.L.C., pursuant to Local Rule 11.1(D)(3) of the United States District Court for the Northern District of Florida, hereby move this Court for special admission to appear in the above-styled matter as counsel for Plaintiff, BellSouth Telecommunications, Inc. ("BellSouth"), and in furtherance thereof, state as follows:

1. Raoul G. Cantero, III, Esq. is a member in good standing of the bar of the State of Florida, and is admitted to practice in the United States District Court for the Southern District of Florida, the United States District Court for the Middle District of Florida, the United States District Court for the Eastern District of Wisconsin and the United States Courts of Appeal for the 11th, 9th, 7th, and 3rd Circuits.

2. Mr. Cantero certifies that he has knowledge of the Local Rules of this Court, and that he resides outside of this district.

3. A Certificate of Good Standing from the United States District Court for the Southern District of Florida for Mr. Cantero is attached hereto.

4. Jeffrey W. Blacher, Esq. is a member in good standing of the bar of the State of Florida, and is admitted to practice in the United States District Court for the Southern District of Florida.

5. Mr. Blacher certifies that he has knowledge of the Local Rules of this Court, and that he resides outside of this district.

6. A Certificate of Good Standing from the United States District Court for the Southern District of Florida for Mr. Blacher is attached hereto.

7. Sean A. Lev is a member in good standing of the bar of the District of Columbia, and is admitted to practice in the United States District Court for the District of Columbia, the United States Supreme Court and other federal courts.

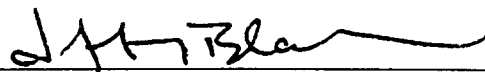
8. Mr. Lev certifies that he has knowledge of the Local Rules of this Court, and that he resides outside of this district.

9. A Certificate of Good Standing from the United States District Court for the District of Columbia for Mr. Lev is attached hereto.

WHEREFORE, Raoul G. Cantero, III, Esq. and Jeffrey W. Blacher, Esq. of the law firm Adorno & Zeder, P.A., and Sean A. Lev of the law firm Kellogg, Huber, Hansen, Todd & Evens, P.L.L.C. respectfully request entry of an order admitting these attorneys *pro hac vice*, authorizing their special admission to appear in this Court on behalf of BellSouth in the above-styled matter.

Respectfully submitted,

ADORNO & ZEDER, P.A.



Raoul G. Cantero, III
Fla. Bar No. 552356
Jeffrey W. Blacher
Fla. Bar No. 0008168
2601 S. Bayshore Dr., Suite 1600
Miami, Florida 33133
(305) 858-5555

Attorneys for BellSouth

CERTIFICATE OF SERVICE

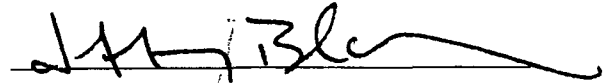
I HEREBY CERTIFY that a true and correct copy of the foregoing Motion to Appear Pro Hac Vice was served via U.S. Mail this 31st day of August, 1999 upon:

Norman H. Horton, Jr.
Floyd R. Self
Messer, Caparello & Self
215 S. Monroe Street
P.O. Box 1876
Tallahassee, FL 32302-1876

Counsel for Defendant E.spire Communications

David Smith
Director of Appeals
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

Counsel for Defendant Florida Public Service Commission

A handwritten signature in black ink, appearing to read "David Smith", written over a horizontal line.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA



CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA
SOUTHERN DISTRICT OF FLORIDA



SS.

I, **CARLOS JUENKE**, Clerk of the United States District Court
for the Southern District of Florida ,

DO HEREBY CERTIFY that *Jeffrey W. Blacher* was duly admitted to practice
in said Court on 07/25/95, and on N/A - Trial Bar, and is in good standing as a member of the
bar of this Court.

Dated at: **Miami, Florida**, this December 11th, 1998

CARLOS JUENKE
Clerk of Court

By *John Blacher*
Deputy Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA



CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA

SOUTHERN DISTRICT OF FLORIDA



SS.

I, **CARLOS JUENKE**, Clerk of the United States District Court
for the Southern District of Florida ,

DO HEREBY CERTIFY that *Raoul G. Cantero* was duly admitted to practice in
said Court on 07/13/88, and on N/A - Trial Bar, and is in good standing as a member of the bar
of this Court.

Dated at: **Miami, Florida**, this December 11th, 1998

CARLOS JUENKE

Clerk of Court

By

A handwritten signature in cursive script that reads "Rita Black". The signature is written over a horizontal line.

Deputy Clerk

CLERK'S OFFICE
United States District Court
for the District of Columbia

Case No. 4:98 CV404 RH

I, **NANCY M. MAYER-WHITTINGTON**, Clerk of the United States District Court for the District of Columbia, do hereby certify that

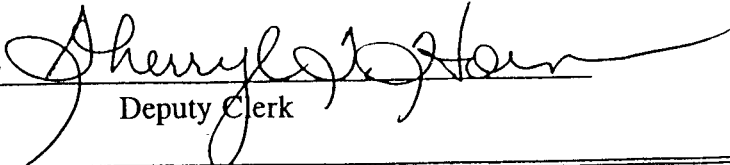
SEAN ABRAM LEV

was, on the 1st day of June A.D. 1998 admitted to practice as an Attorney at Law at the Bar of this Court, and is, according to the records of this Court, a member of said Bar in good standing.

In Testimony Whereof, I hereunto subscribe my name and affix the seal of said Court in the City of Washington this
15th day of April, A.D. 1999.

NANCY M. MAYER-WHITTINGTON, Clerk

By


Deputy Clerk