# McGuire, Cradock & Strother, P.C.

2501 N. HARWOOD, SUITE 1800 DALLAS, TEXAS 75201 www.mcslaw.com

TROY P. MAJOUE DIRECT: 214.954.6824 tmajouc@mcslaw.com 1. N. A. TELEPHONE: 214.954.6800
TELECOPIER: 214.954.6868

August 15, 2011

### CERTIFIED MAIL # 7160 3901 9846 4373 6162 RETURN RECEIPT REQUESTED

Chairman Eddie Roberson C/O Sharla Dillon Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, Tennessee 37243-0505

Re: DOCKET NO.: 11-00108 - IN RE COMPLAINT OF CONCORD TELEPHONE EXCHANGE, INC., ET AL., AGAINST HALO WIRELESS, INC., TRANSCOM ENHANCED SERVICES, INC. AND OTHER AFFILIATES FOR FAILURE TO PAY TERMINATING INTRASTATE ACCESS CHARGES FOR TRAFFIC AND OTHER RELIEF AND AUTHORITY TO CEASE TERMINATION OF TRAFFIC

#### Dear Ms. Dillon:

Enclosed herewith for filing in connection with the above-referenced proceeding are the following:

- (1) Original and thirteen (13) copies of Steven H. Thomas' Motion for Admission Pro Hac Vice;
- (2) Original and thirteen (13) copies of Troy P. Majoue's Amended Motion for Admission Pro Hac Vice; and
- (3) Original and thirteen (13) copies of Jennifer M. Larson's Amended Motion for Admission Pro Hac Vice.

By copy of this letter, copies of the enclosed have been served upon counsel for Complainants and other designated contact individuals.

Chairman Eddie Roberson C/O Sharla Dillon Tennessee Regulatory Authority August 15, 2011 Page 2

Sincerely,

McGuire, Craddock & Strother, P.C.

Troy P. Majou

TPM/vwk Enclosures

cc: Tennessee Board of Professional Responsibility of the Supreme Court of Tennessee

(Certified Mail #7160 3901 9846 4373 6179, RRR)

H. LaDon Baltimore, Esq. (Certified Mail #7160 3901 9846 4373 6186, RRR)

Norman J. Kennard, Esq. (Certified Mail #7160 3901 9846 4373 6193, RRR)

## BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

IN RE:

COMPLAINT OF :

CONCORD TELEPHONE EXCHANGE, INC., :

HUMPHREYS COUNTY TELEPHONE COMPANY, TELLICO TELEPHONE

COMPANY, TENNESSEE TELEPHONE

COMPANY, CROCKETT TELEPHONE : DOCKET NO.: 1100108

COMPANY, INC. PEOPLES TELEPHONE

COMPANY, WEST TENNESSEE

TELEPHONE COMPANY, INC., NORTH

CENTRAL TELEPHONE COOP., INC. AND

HIGHLAND TELEPHONE COOPERATIVE,

INC. AGAINST HALO WIRELESS, INC.,

TRANSCOM ENHANCED SERVICES, INC.

AND OTHER AFFILIATES FOR FAILURE

TO PAY TERMINATING INTRASTATE

ACCESS CHARGES FOR TRAFFIC AND

OTHER RELIEF AND AUTHORITY TO CEASE TERMINATION OF TRAFFIC

### STEVEN H. THOMAS' MOTION FOR ADMISSION PRO HAC VICE

COMES NOW, Steven H. Thomas ("Thomas") and seeks admission *pro hac vice* to the Tennessee Regulatory Authority, pursuant to Tennessee Supreme Court Rule 19 and Tennessee Regulatory Authority Rule 1220-1-2-.04, to represent both Halo Wireless, Inc. and Transcom Enhanced Services, Inc. In accordance with Rule 19, the Affidavit of Steven H. Thomas is attached as **Exhibit A** and Thomas' Certificate of Good Standing from the United States District Court for the Northern District of Texas is attached as **Exhibit B**. Thomas' Certificate of Good Standing from the Supreme Court of Texas is attached as **Exhibit C**.

Respectfully submitted

STEVENTION

Texas State Bar No. 19868890 pro hac vice motion pending

TROY P. MAJOUE

Texas State Bar No. 24067738 pro hac vice motion pending

JENNIFER M. LARSON

Texas State Bar No. 24071167 pro hac vice motion pending

McGUIRE, CRADDOCK & STROTHER, P.C.

2501 N. Harwood, Suite 1800 Dallas TX 75201

Phone: 214.954.6800 Fax: 214.954.6850

#### W. SCOTT MCCOLLOUGH

Texas State Bar No. 13434100 pro hac vice motion pending

#### **MATTHEW A. HENRY**

Texas State Bar No. 24059121 pro hac vice motion pending

#### McCollough|Henry PC

1250 S. Capital of Texas Hwy., Bldg. 2-235

West Lake Hills, TX 78746

Phone: 512.888.1112 Fax: 512.692.2522

#### PAUL S. DAVIDSON

Tennessee Bar No. 011789

#### JAMES M. WEAVER

Tennessee Bar No. 013451 WALLER LANSDEN DORTCH & DAVIS, LLP

511 Union Street, Suite 2700

Nashville, TN 37219 Direct: 615-850-8942 Fax: 615-244-6804

Attorneys for Halo Wireless, Inc.

#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing *Motion for Admission Pro Hac Vice* was served via regular mail and/or certified mail, return receipt requested, on the following counsel of record and designated contact individuals on this the 15<sup>th</sup> day of August, 2011:

Tennessee Board of Professional Responsibility of the Supreme Court of Tennessee 10 Cadillac Drive Suite 220
Brentwood, Tennessee 37027

ATTORNEYS FOR CONCORD TELEPHONE EXCHANGE, INC., HUMPHREYS COUNTY TELEPHONE COMPANY, TELLICO TELEPHONE COMPANY, TENNESSEE TELEPHONE COMPANY, CROCKETT TELEPHONE COMPANY, INC. PEOPLES TELEPHONE COMPANY, WEST TENNESSEE TELEPHONE COMPANY, INC., NORTH CENTRAL TELEPHONE COOP., INC. AND HIGHLAND TELEPHONE COOPERATIVE, INC.:

H. LaDon Baltimore FARRAR & BATES 211 7<sup>th</sup> Ave., N. Suite 500 Nashville, TN 37219

Norman J. Kennard THOMAS, LONG, NIESEN & KENNARD 212 Locust Street Suite 500 Harrisburg, PA 17108-9500

# BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

IN RE: : COMPLAINT OF :

CONCORD TELEPHONE EXCHANGE, INC., :

HUMPHREYS COUNTY TELEPHONE

COMPANY, TELLICO TELEPHONE :

COMPANY, TENNESSEE TELEPHONE

COMPANY, CROCKETT TELEPHONE : DOCKET NO.: 1100108

COMPANY, INC. PEOPLES TELEPHONE

COMPANY, WEST TENNESSEE

TELEPHONE COMPANY, INC., NORTH

CENTRAL TELEPHONE COOP., INC. AND HIGHLAND TELEPHONE COOPERATIVE,

INC. AGAINST HALO WIRELESS, INC.,

TRANSCOM ENHANCED SERVICES, INC.

AND OTHER AFFILIATES FOR FAILURE

TO PAY TERMINATING INTRASTATE

ACCESS CHARGES FOR TRAFFIC AND

OTHER RELIEF AND AUTHORITY TO

CEASE TERMINATION OF TRAFFIC

## AFFIDAVIT OF STEVEN H. THOMAS

STATE OF TEXAS §

§ §

COUNTY OF DALLAS §

**BEFORE ME**, the undersigned authority, personally appeared **STEVEN H. THOMAS**, who, being by me first duly sworn, deposed upon his oath as follows:

1. "My name is Steven H. Thomas. I am an attorney licensed to practice law in Texas. I am over twenty-one (21) years of age, of sound mind and capable of making this Affidavit. I have never been convicted of a felony or crime involving moral turpitude. All matters stated herein are based upon my personal knowledge unless otherwise so stated.

EXHIBIT Is a second of the sec

Page 1

- 2. My office address is McGuire, Craddock & Strother, P.C., 2501 N. Harwood, Suite 1800, Dallas, Texas 75201. I was licensed to practice law in the State of Texas on May 10, 1991, under bar number 19868890, and in the State of New York in 1990. I am admitted to practice in the United States District Court for the Northern District of Texas (1993), the United States District Court for the Eastern District of Texas (2007), the United States District Court for the Western District of Texas (1992), the United States District Court for the Southern District of Texas (1993), the United States District Court for the Southern District of New York (1998), and the United States Court of Appeals for the Second Circuit (1998), Fifth Circuit (1998), and Ninth Circuit (2010). I am a member in good standing in all jurisdictions in which I am licensed to practice law.
- 3. Through my Motion for Admission Pro Hac Vice (the "Motion"), I seek to represent both Halo Wireless, Inc. and Transcom Enhanced Services, Inc. in the above-referenced action before the Tennessee Regulatory Authority.
- 4. I have not sought admission in any trial or appellate court of Tennessee within the preceding three years. Further, I have not been denied *pro hac vice* admission or had an admission *pro hac vice* revoked by any court in any jurisdiction.
- 5. I have not been disciplined or sanctioned by the Board of Professional Responsibility of the Supreme Court of Tennessee or by any similar lawyer disciplinary agency in any jurisdiction. Further, no disciplinary action or investigation concerning my conduct is pending before the Board of Professional Responsibility of the Supreme Court of Tennessee or before any similar lawyer disciplinary agency in any jurisdiction.
- 6. I am familiar with the Tennessee Rules of Professional Conduct and the rules governing proceedings before the Tennessee Regulatory Authority.

- 7. I consent to the disciplinary jurisdiction of the Board of Professional Responsibility of the Supreme Court of Tennessee and the courts of Tennessee in any manner arising out of my conduct in any proceeding and I agree to be bound by the Tennessee Rules of Professional Conduct and any other rules of conduct applicable to lawyers generally admitted in Tennessee.
- 8. Paul S. Davidson and James M. Weaver, Waller Lansden Dortch & Davis, LLP, 511 Union Street, Suite 2700, Nashville, Tennessee 37219, 615-850-8942, and Tennessee Bar Number 011789 (Davidson) and Tennessee Bar Number 013451 (Weaver) are associated in accordance with Tennessee Supreme Court Rule 19(g).
- 9. Per discussion with the Tennessee Regulatory Authority, no fees are required to be paid in connection with the Motion.
- 10. As stated in the Motion, I will serve the Motion and all exhibits upon all counsel of record in the proceeding and upon the Board of Professional Responsibility of the Supreme Court of Tennessee."

### FURTHER AFFIANT SAYETH NOT.

STEVEN B. LUONAS

SUBSCRIBED and SWORN TO before me, on this, the day of August, 2011.

[SEAL]



**NOTARY PUBLIC** in and for the State of Texas

Commission Expires: 2-25-1

## U.S. DISTRICT COURT NORTHERN DISTRICT OF TEXAS

### CERTIFICATE OF GOOD STANDING

I, Karen Mitchell, Clerk of the U.S. District Court for the Northern District of Texas, certify that the attorney named below is admitted to practice before this court and is currently in good standing:

## Steven H. Thomas

Bar Number:	Date of Admission:	
19868890	July 9, 1993	
Witness my official signature and the sea	al of this court.	
Dated: July 29, 2011	_ Karen Mitchell, Clerk of Court	
	By: Penny Hunton Deputy Clerk	:

Fee: \$15.00



## The Supreme Court of Texas

**AUSTIN** 

**CLERK'S OFFICE** 

I, BLAKE HAWTHORNE, Clerk of the Supreme Court of Texas, certify that the records of this office show that

#### Steven H. Thomas

was duly admitted and licensed as an attorney and counselor at law by the Supreme Court of Texas on the 10th day of May, 1991.

I further certify that the records of this office show that, as of this date

#### Steven H. Thomas

is presently enrolled with the State Bar of Texas as an active member in good standing.

and the seal of the Supreme Court of Texas at the City of Austin, this, the 4th day of August, 2011.

BLAKE HAWTHORNE, Clerk

Blanca E. Valdez, Deputy Clerk

No. 080411B

