

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE

RE:

Docket No. 19-00099

*AT&T Tennessee Complaint Against
Cellular South, Inc. D/B/A C Spire*

**MOTION FOR ADMISSION AND APPLICATION TO APPEAR PRO HAC VICE
AND DECLARATION OF MARK A. KEFFER IN SUPPORT THEREOF**

Pursuant to Rule 19 of the Rules of the Supreme Court of the State of Tennessee, Mark A. Keffer, an attorney for AT&T Tennessee (“AT&T”), hereby makes application for permission to appear and participate in the above-referenced docket on behalf of AT&T with co-counsel, Jeremey R. Goolsby.

In support of his application, Mr. Keffer does hereby attest as follows:

1. His full name is Mark A. Keffer. His residence address is 75 Fourteenth Street, Suite 3860, Atlanta, GA 30309, and his office address is One CNN Center, SW1424C, Atlanta, GA 30303.
2. He is employed by AT&T Services, Inc. as Vice President – Associate General Counsel and wishes to appear with Mr. Goolsby as co-counsel in this matter on behalf of AT&T.
3. He is licensed, in good standing, and was first admitted in January, 1980, to practice law in the State of West Virginia (Bar Number 1988). (*See* Certificate of Good Standing attached hereto as Exhibit A). He is also admitted in the Commonwealth of Virginia (Bar License 27355) and in the District of Columbia (DC Bar 417901).
4. Mr. Keffer agrees to subject himself to the jurisdiction of the Tennessee Public Utility Commission (“TPUC” or “Commission”) in any manner arising out of his conduct in such

proceeding and agrees to be bound by the rules governing the conduct of attorneys appearing before this Commission.

5. In the preceding three years, Mr. Keffer has not sought admission or been admitted pro hac vice in any court or agency in the State of Tennessee.

6. Mr. Keffer has never been denied admission pro hac vice by any court or agency.

7. Mr. Keffer has never been disciplined or sanctioned by the Board of Professional Responsibility of the Supreme Court of Tennessee, nor by any similar lawyer discipline agency or authority with any other jurisdiction.

8. There are no disciplinary actions or investigations concerning the conduct of Mr. Keffer pending before the Board of Professional Responsibility of the Supreme Court of Tennessee, nor by any similar lawyer discipline agency or authority with any other jurisdiction.

9. Mr. Keffer is familiar with the Tennessee Rules of Professional Conduct and the rules governing the proceedings of the TPUC, the agency before which he now seeks to practice.

10. Mr. Keffer consents to the disciplinary jurisdiction of the Board of Professional Responsibility of the Supreme Court of Tennessee and the courts and agencies of Tennessee in any matter arising out of his conduct in the proceeding and he agrees to be bound by the Tennessee Rules of Professional Conduct and any other rules of conduct applicable to lawyers generally admitted in Tennessee.

11. Jeremy R. Goolsby, Frost Brown Todd LLC, 150 3rd Avenue South, Suite 1900, Nashville, Tennessee 37201, Board of Professional Responsibility of the Supreme Court of Tennessee registration number 034505 shall serve as co-counsel with Mr. Keffer in this matter. Mr. Goolsby's telephone number is (615) 251-5550 and his email address is jgoolsby@fbtlaw.com.

12. A copy of the Motion and Declaration, along with the requisite fees, have been submitted to the Board of Professional Responsibility of the Supreme Court of Tennessee.

WHEREFORE, Mark A. Keffer requests that he be admitted pro hac vice to appear and participate in the above-styled docket on behalf of AT&T.

Respectfully submitted, this 13th day of May, 2020.

By: /s/ Mark A. Keffer
MARK A. KEFFER
Vice President – Associate General Counsel
AT&T Services, Inc. One CNN Center, Room SW1424C
Atlanta, GA 30303
404 893-7946
mk6251@att.com

and

/s/ Jeremy R. Goolsby
JEREMEY R. GOOLSBY (BPR NO. 034505)
Frost Brown Todd
150 3rd Avenue South, Suite 1900
Nashville, Tennessee 37201
615.251.5550
jgoolsby@fbtlaw.com

*Attorneys for BellSouth Telecommunications, LLC d/b/a
AT&T Tennessee*

CERTIFICATE OF SERVICE

I, Jeremy R. Goolsby, attorney of record for BellSouth Telecommunications, LLC d/b/a AT&T Tennessee, hereby certify that I have this day caused to be delivered by U.S. Mail and electronic mail, a copy of the above and foregoing document to:

ATTORNEYS FOR CELLULAR SOUTH, INC.

Henry Walker
Bradley Arant Boult Cummings, LLP
1600 Division Street, Suite 700
Nashville, TN 37203
615.252.2363
hwalker@babco.com

This 13th day of May, 2020.

/s/ Jeremy R. Goolsby
Jeremy R. Goolsby

0139277.0664648 4846-6384-6844v3

EXHIBIT A

THE WEST VIRGINIA STATE BAR

Certificate of Good Standing

Mark A. Keffer - WWSB ID# 1988

This is to certify that, according to the records of the West Virginia State Bar, Mark A. Keffer, of ATLANTA, GA, was admitted to practice law by the West Virginia Supreme Court of Appeals on January 8, 1980, and was registered as a member of The West Virginia State Bar in January, 1980.

It is further certified that the said Mark A. Keffer, according to our membership records, is currently an Active member in good standing with The West Virginia State Bar.

Given over my hand and seal of The West Virginia State Bar this day, May 13, 2020.



Anita R. Casey, Esquire
Executive Director
The West Virginia State Bar

**DECLARATION OF MARK A. KEFFER
IN SUPPORT OF APPLICATION FOR PRO HAC VICE ADMISSION**

I, MARK A. KEFFER, affirming that I am of lawful age and competent to testify to the matters contained herein, state upon my personal knowledge as follows:

1. My full name is Mark A. Keffer. My residence address is 75 Fourteenth Street, Suite 3860, Atlanta, GA 30309, and my office address is One CNN Center, SW1424C, Atlanta, GA 30303.
2. I am employed by AT&T Services, Inc. as Vice President – Associate General Counsel. My telephone number is 404 893-7946 and my email address is mk6251@att.com.
3. I am licensed, in good standing, and was first admitted in January, 1980, to practice law in the State of West Virginia (Bar Number 1988). I am also admitted in the Commonwealth of Virginia (Bar License 27355) and in the District of Columbia (DC Bar 417901).
4. I seek to appear on behalf of BellSouth Telecommunications, LLC d/b/a AT&T Tennessee in the following entitled case: *In Re: AT&T Tennessee Complaint Against Cellular South, Inc. d/b/a C Spire*, Docket No. 19-00099.
5. I have not previously been admitted or sought such admission in any trial or appellate court of Tennessee within the preceding three (3) years.
6. I have not previously been admitted or sought such admission pro hac vice nor had I had such an admission revoked by any court or agency in any jurisdiction.
7. I have never been disciplined or sanctioned by the Board of Professional Responsibility of the Supreme Court of Tennessee, nor by any similar lawyer disciplinary agency or authority in any other jurisdiction.

8. There are no disciplinary actions or investigations concerning my conduct pending before the Board of Professional Responsibility of the Supreme Court of Tennessee, nor before any similar lawyer disciplinary agency or authority in any other jurisdiction.
9. I am familiar with the Tennessee Rules of Professional Conduct and the rules governing the proceedings of the agency before which I seek to practice.
10. 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 matter arising out of my conduct in the 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.
11. I seek to appear along with Jeremey R. Goolsby of Frost Brown Todd LLC, 150 3rd Avenue South, Suite 1900, Nashville, Tennessee 37291. Mr. Goolsby's Board of Professional Responsibility of the Supreme Court of Tennessee registration number is 034505. His telephone number is (615) 251-5550 and his email address is jgoolsby@fbtlaw.com.
12. A copy of the Motion and Declaration supporting my pro hac vice admission will be served upon all counsel of record in the proceeding and filed with the Commission.
13. A copy of the Motion and Declaration, along with the requisite fees, have been submitted to the Board of Professional Responsibility of the Supreme Court of Tennessee.

Pursuant to Tennessee Rule of Civil Procedure 72, I declare under penalty of perjury that the foregoing is true and correct.

Dated this 13th day of May, 2020.

Mark A. Keffer signed by *Jerome Goolsby*
permission

Mark A. Keffer

0139277.0664648 4835-7090-2972v2