

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

FIBER TECHNOLOGIES NETWORKS, L.L.C.
f/k/a FIBER SYSTEMS, LLC
140 Allens Creek Road
Rochester, New York 14618

Complainant,

v.

VERIZON NEW ENGLAND, f/k/a NEW ENGLAND
TELEPHONE AND TELEGRAPH COMPANY
185 Franklin Street, Room 1403
Boston, Massachusetts 02110

and

NORTHEAST UTILITIES SERVICE COMPANY
d/b/a WESTERN MASSACHUSETTS ELECTRIC CO.
107 Selden Street
Berlin, Connecticut 06037

Respondents.

D.T.E. 02- ____

MOTION TO ENROLL AS COUNSEL *PRO HAC VICE*

Complainant, Fiber Technologies Networks, L.L.C. (“Fibertech”), respectfully moves that Charles B. Stockdale and Robert T. Witthauer be allowed to appear as counsel *pro hac vice* on behalf of Fibertech, and in support of said motion states as follows:

1. That Charles B. Stockdale serves as Vice President & Corporate Counsel for Fibertech, and that he is duly licensed to practice law in the state of New York, and he desires to enroll as counsel *pro hac vice* for Fibertech in this action;

2. That Robert T. Witthauer serves as Deputy Corporate Counsel for Fibertech, and that

he is duly licensed to practice law in the states of New York, Arkansas, Mississippi and Tennessee, and he desires to enroll as counsel *pro hac vice* for Fibertech in this action;

3. That they are members in good standing of the bars of said states, and have never been the subject of any disciplinary proceeding before any court or administrative body.

WHEREFORE, Fibertech respectfully requests that Charles B. Stockdale and Robert T. Witthauer be allowed to appear as attorneys *pro hac vice* for Fibertech in this matter until the conclusion of this case.

Respectfully submitted,

FIBER TECHNOLOGIES NETWORKS, L.L.C.
By: Fibertech Networks, LLC, its sole member

By: _____
Charles B. Stockdale, V.P. & Corporate Counsel
Robert T. Witthauer, Deputy Corporate Counsel
Fibertech Networks, LLC
140 Allens Creek Road
Rochester, New York 14618
Phone: (585) 697-5100

Dated: January 21, 2003

CERTIFICATE OF SERVICE

I hereby certify that on August 13, 2002, I served a copy of the foregoing on the Respondents,
by delivering a copy of the same to:

Bruce P. Beausejour, Esq.
Verizon New England
185 Franklin Street
Room 1403
Boston, MA 02110

Stephen Gibelli, Esq.
Northeast Utilities Service Company
107 Selden Street
Berlin, CT 06037

By:_____

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FIBER TECHNOLOGIES NETWORKS, L.L.C.)	
)	
Complainant,)	
)	
v.)	D.T.E. 02-_____
)	
VERIZON NEW ENGLAND and)	
NORTHEAST UTILITIES SERVICE COMPANY)	
)	
Respondents.)	
)	

On the motion of the Complainant to have Charles B. Stockdale and Robert T. Witthauer admitted *pro hac vice* as attorneys of record for Complainant in the above-captioned matter, the DTE finds that said motion is well taken and should be granted. It is therefore,

SO ORDERED this the ____ day of _____, 2002.

LIT 1352693v1