

**BEFORE THE
MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS
AND CABLE**

In the Matter of the Application of Nexus
Communications, Inc. for Designation as an
Eligible Telecommunications Carrier for Low
Income Support Only

D.T.C. 11-7

**MOTION FOR ADMISSION *PRO HAC VICE*
OF DANIELLE FRAPPIER AND JAMES W. TOMLINSON**

Nexus Communications, Inc. ("Nexus") requests that the Massachusetts Department of Telecommunications and Cable admit Danielle Frappier and James W. Tomlinson, Esq. as counsel *pro hac vice* to appear before the Department on behalf of Nexus. In support of this motion, Nexus states that Ms. Frappier, Mr. Tomlinson and their firm, Davis Wright Tremaine LLP, presently is engaged by Nexus in several other states in similar matters. Accordingly, Ms. Frappier's and Mr. Tomlinson's admission *pro hac vice* is necessary for efficient representation with respect to Nexus' application for ETC status in the Commonwealth. Ms. Frappier and Mr. Tomlinson will be appearing with undersigned counsel, a member of the Massachusetts bar. In support of this Motion, Nexus submits the affidavits of Danielle Frappier and James W. Tomlinson.

Respectfully submitted,

NEXUS COMMUNICATIONS, INC.



By:

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