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RECEIVED KANSAS CORPORATION COMMISSION

MAR 06 2012

CONSERVATION DIVISION WICHITA, KS

Before Commissioners:

Mark Sievers, Chairman Ward Loyd Thomas E. Wright

THE STATE CORPORATION COMMISSION

OF THE STATE OF KANSAS

In the matter of an Order to Show Cause on) the Commission's own Motion issued to) Osborn Energy, L.L.C. and Central States) Energy LLC., with regard to responsibility) under K.S.A. 55-179 for plugging the Adams) Lease in Section 12, Township 15 South,) Range 24 East, Johnson County, Kansas) Docket No. 12-CONS-152-CSHO

CONSERVATION DIVISION

License No. 32294 (expired) 34570

MOTION FOR ADMISSION *PRO HAC VICE* OF FOREIGN OUT-OF-STATE ATTORNEY TO PRACTICE WITH INCORPORATED VERIFIED APPLICATION, OATH AND AFFIDAVIT

Philip V. Sumner, an attorney not licensed to practice in Kansas, respectfully moves the State Corporation Commission of Kansas ("Commission" or "KCC") pursuant to Rule 116 of the Supreme Court, for an order allowing him to practice before the Commission for the business and purpose of the above-captioned matter.

In support of this motion, the above-named out-of-state attorney represents and shows that he is regularly admitted to the Courts of record of the State of Missouri; is regularly engaged in the practice of law in that state; and is in good standing pursuant to the rules of the highest appellate court of that state. The above-named out-of-state attorney has professional business before the Commission consisting of the representation of Central States Energy, L.L.C. in this matter.

VERIFIED APPLICATION AND MOTION

1. Philip V. Sumner, a foreign attorney, seeks to represent the interests of Central States Energy, L.L.C., in the above-captioned matter;

2. He is associated with and personally appears in this action with Jacqueline M.

Sexton, a local attorney, whose name, business address, telephone number, and Kansas registration number appear as follows on this motion;

3. Mr. Sumner's address is 911 Main Street, 30th Floor, Kansas City, Missouri 64105 and his telephone number is (816) 472-7474.

4. Philip V. Sumner is admitted to the Bar Association(s) of the following states and/or courts:

- a. Arizona, admitted October 22, 2002, Arizona Bar No# 022054;
- b. U.S. District Court for the District of Arizona, admitted December 9, 2002;
- c. 9th Circuit Court of Appeals, admitted February 18, 2003;
- d. Texas, admitted January 10, 2008, Texas Bar No# 24061338;
- e. Missouri, admitted August 19, 2008, MO Bar Association# 60589;
- f. U.S. District Court for the Western District of Missouri, admitted February 16, 2009; and
- g. U.S. District Court for the District of Kansas, admitted June 3, 2009, Fed. #78169.

5. Philip V. Sumner is currently a member in good standing before each of these Bar

Association(s).

6. Philip V. Sumner is also not the subject of prior public discipline, including but

not limited to suspension or disbarment in any jurisdiction.

7. He is also not currently the subject of a disciplinary action or investigation in any

jurisdiction; and

8. Philip V. Sumner has received admission pro hac vice to Courts in the State of

Kansas for the following matters within the past twelve (12) months:

- a. Becky Goodman v. James R. Belfield, et al., Case No. 10 CV 06364, in Johnson County, Kansas;
- b. Dennis Reynolds v. Stonebridge Enterprises, LLC, Case No. 11 CV 03567, in Johnson County, Kansas; and
- c. LaMont Brown v. Tow Rifik, LLC, et al., Case No. 2011CV552, in Leavenworth County, Kansas.

From: FOLAND WICKENS

9. Philip V. Sumner, is affiliated, associated, and personally appears with the undersigned, local counsel, Jacqueline M. Sexton, who is duly and regularly admitted to practice in the Courts of the State of Kansas, who regularly engages in the practice of law in Kansas, and who is in good standing under all the applicable rules of the Supreme Court of the State of Kansas. Ms. Sexton will be actively engaged in the conduct of this case, including signing all pleadings, documents, and/or briefs, where applicable, and an option for service of all pleadings. If necessary, Ms. Sexton will be present throughout all hearings or administrative appearances. Finally, Mr. Sumner does not seek this limited admission for any ill purpose.

10. For these reasons, the undersigned hereby move the Commission for an Order of Admission and apply for such Order of Admission *Pro Hac Vice* for this matter.

Approval:

Sacqueline M. Sexton KS#19878 KOLAND, WICKENS, EISFELDER, ROPER & HOFER, P.C 911 Main Street, 30th Floor Kansas City, Missouri 64105 (816) 472-7474 (816) 472-6262 - FAX jsexton@fwpclaw.com Respectfully submitted,

Philip V. Sumner, Esq. Foreign Attorney FOLAND, WICKENS, EISFELDER, ROPER & HOFER, P.C. 911 Main Street, 30th Floor Kansas City, Missouri 64105 (816) 472-7474 (816) 472-6262 – FAX psumner@fwpclaw.com

ATTORNEYS FOR CENTRAL STATES ENERGY, L.L.C.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 6th day of March 2012, a true and accurate copy of the foregoing was served via U.S. Mail, postage prepaid, upon:

John McCannon Litigation Counsel Kansas Corporation Commission Finney State Office Building 130 S. Market, Suite 2078 Wichita, Kansas 67202-3802

John Almond KCC District 3 1500 W. 7th Street Chanute, Kansas 66720

Robert Jenkins Well Plugging Coordinator Kansas Corporation Commission Finney State Office Building 130 S. Market, Suite 2078 Wichita, Kansas 67202-3802

Jim Osborn Osborn Energy, L.L.C. 24850 Farley Bucyrus, Kansas 66013

Jim Osborn Central States Energy, L.L.C. 24850 Farley Bucyrus, Kansas 66013

for Central States Energy,