

6

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

Alma Communications Company d/b/a Alma
Telephone Company, Chariton Valley Telephone
Corporation, Chariton Valley Telecom Corporation,
Choctaw Telephone Company, Mid-Missouri
Telephone Company, a corporate division of Otelco,
Inc., and MoKAN DIAL, Inc.

Complainants,

vs.

Halo Wireless, Inc.

Respondent.

Case No. IC-2011-0385

AND

BPS Telephone Company, Citizens Telephone
Company of Higginsville, Mo., Craw-Kan Telephone
Cooperative, Inc., Ellington Telephone Company,
Farber Telephone Company, Fidelity Communications
Services I, Inc., Fidelity Communications
Services II, Inc., Fidelity Telephone Company,
Goodman Telephone Company, Granby Telephone
Company, Grand River Mutual Telephone Corporation
Green Hills Telephone Corporation, Green Hills
Telecommunications Services, Holway Telephone
Company, Iamo Telephone Company, Kingdom
Telephone Company, K.L.M. Telephone Company,
Lathrop Telephone Company, Le-Ru Telephone
Company, Mark Twain Rural Telephone Company,
Mark Twain Communications Company, McDonald
County Telephone Company, Miller Telephone
Company, New Florence Telephone Company,
New London Telephone Company, Northeast
Missouri Rural Telephone Company, Orchard Farm
Telephone Company, Oregon Farmers Mutual
Telephone Company, Ozark Telephone Company,
Peace Valley Telephone Company, Inc., Rock Port
Telephone Company, Seneca Telephone Company,
Steelville Telephone Exchange, Inc., and Stoutland
Telephone Company,

Complainants,

v.

Halo Wireless, Inc.,

Respondent.

Case No. TC-2011-0404

**AMENDED PETITION FOR LEAVE TO APPEAR AND
PARTICIPATE AND STATEMENT OF GOOD STANDING**

966130

Page 1

1

1

**AMENDED PETITION FOR LEAVE TO APPEAR AND PARTICIPATE
AND STATEMENT OF GOOD STANDING**

COME NOW, Troy P. Majoue, Steven H. Thomas, and W. Scott McCollough (collectively "Petitioners") and filed this Amended Petition for Leave to Appear and Participate as counsel for Halo Wireless, Inc ("Halo") in the two above referenced matters.

RESERVATION OF RIGHTS

This Petition is not, and shall not be construed as, an appearance of Halo itself. Halo objects to the Missouri Public Service Commission's ("Missouri PSC") attempt to exercise personal jurisdiction over Halo and subject matter jurisdiction over the disputes and claims raised in the above referenced matters. A Motion to Dismiss is being filed contemporaneously herewith in each of the above referenced matter asserting these objections more fully. This Petition is for the sole purpose of allowing Halo's counsel to appear and participate in the above matters as necessary for the preservation and protection of Halo's rights and objections which are expressly reserved.

PETITIONER TROY P. MAJOUÉ

1. Pursuant to CSR 4 240-2.040, Petitioner Troy P. Majoue ("Majoue") is not a member of the Missouri Bar, but is a member in good standing of the bars of the State of Louisiana, the State of Texas, and the State of Alabama. Further, Majoue is admitted and is a member in good standing in the Northern District of Texas, the Southern District of Texas, the Eastern District of Texas, the Eastern District of Louisiana, the Western District of Louisiana, the Middle District of Louisiana, and the United States Court of Appeals for the Fifth Circuit.

PETITIONER STEVEN H. THOMAS

2. Pursuant to 4 CSR 240-2.040, Petitioner Steven H. Thomas ("Thomas") is not a member of the Missouri Bar, but is a member in good standing of the bars of the State of New

York and the State of Texas. Further, Thomas is admitted and is a member in good standing in the Northern District of Texas, the Southern District of Texas, the Eastern District of Texas, the Western District of Texas, the Southern District of New York, the United States Court of Appeals for the Fifth Circuit, the United States Court of Appeals for the Second Circuit, and the United States Court of Appeals for the Ninth Circuit.

PETITIONER W. SCOTT MCCOLLOUGH

3. Pursuant to 4 CSR 240-2.040, Petitioner W. Scott McCollough ("McCollough") is not a member of the Missouri Bar, but is a member in good standing of the bar of the State of Texas. Further, McCollough is admitted and is a member in good standing in the Western District of Texas and the United States Court of Appeals for the Fifth Circuit.

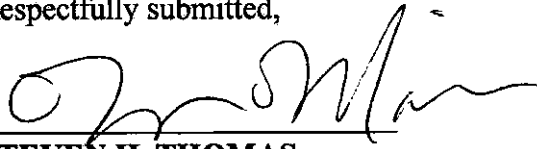
DESIGNATION OF ASSOCIATE COUNSEL

4. Pursuant to 4 CSR 240-2.040, Halo designates Louis A. Huber, III ("Huber"), Missouri Bar Number 28447, who is a member in good standing of the Missouri Bar having an office within Missouri, as associate counsel. Huber will simultaneously enter an appearance as an attorney of record.

OTHER REQUIREMENTS

5. Pursuant to 4 CSR 240-2.040 and Supreme Court Rules 6.01 and 9.03, the above Petitioners and counsel for Halo have paid the applicable fees for the *pro hac vice* admission in the two above referenced matters requested herein. At the time of the filing of Petitioners' original Petition for Leave, however, Petitioners had not yet received receipts for payment of said fees and therefore attached other evidence of the payment of the fees to the Missouri Supreme. Petitioners have since obtained receipts for the payment of the applicable *pro hac vice* fees and have attached same hereto as Exhibit 1.

Respectfully submitted,



STEVEN H. THOMAS

Texas State Bar No. 19868890

TROY P. MAJOUÉ

Texas State Bar No. 24067738

**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

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

LOUIS A. HUBER, III,

Missouri Bar No. 28447

SCHLEE, HUBER, McMULLEN & KRAUSE, P.C.

4050 Pennsylvania, Suite 300

P. O. Box 32430

Kansas City, MO 64171-5430

Telephone: (816) 931-3500

Facsimile: (816) 931-3553

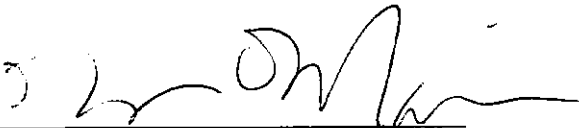
Attorneys for Halo Wireless, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing *Amended Petition for Leave to Appear and Participate and Statement of Good Standing* was served via regular mail and/or certified mail, return receipt requested, on the following counsel of record individuals on this the 27th day of July, 2011:

W.R. England, III
Brian T. McCartney
Brydon, Swearengen & England P.C.
312 East Capitol Avenue
P.O. Box 456
Jefferson City, Missouri 65102-0456
(573) 635-7166 telephone
(573) 634-7431 facsimile

Craig S. Johnson
Johnson & Sporleder, LLP
304 E. High St., Suite 200
P.O. Box 1670
Jefferson City, Missouri 65102
(573) 659-8734 telephone
(573) 761-3587 facsimile



Troy P. Majoue

EXHIBIT 1



**CLERK OF THE SUPREME COURT
STATE OF MISSOURI
POST OFFICE BOX 150
JEFFERSON CITY, MISSOURI
65102**

BILL L. THOMPSON
INTERIM CLERK

TELEPHONE
(573) 751-4144

July 26, 2011

This will hereby acknowledge receipt of \$300 as required by Rule 6.01(m) for Troy P. Majoue, Steven H. Thomas & William Scott McCollough , appearing in Alma Communications Company d/b/a Alma Telephone Company, et al. v. Halo Wireless, Inc., Case No. IC-2011-0385, before the Public Service Commission, State of Missouri.

Bill L. Thompson

Bill L. Thompson, Interim Clerk



**CLERK OF THE SUPREME COURT
STATE OF MISSOURI
POST OFFICE BOX 150
JEFFERSON CITY, MISSOURI
65102**

**BILL L. THOMPSON
INTERIM CLERK**

**TELEPHONE
(573) 751-4144**

July 26, 2011

This will hereby acknowledge receipt of \$300 as required by Rule 6.01(m) for Troy P. Majoue, Steven H. Thomas & William Scott McCollough, appearing in BPS Telephone Company, et al. v. Halo Wireless, Inc., Case No. TC-2011-0404, before the Public Service Commission, State of Missouri.

Bill L. Thompson

Bill L. Thompson, Interim Clerk

Your submission to IC-2011-0385 has been successfully submitted

