# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

OURI	FILED <sup>2</sup>
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S	Service Commission
Case No. EC-2002	

The Staff of the Missouri Public

Service Commission,

Complainant,

V.

Union Electric Company, d/b/a
AmerenUE,

Respondent.

### REQUEST FOR LEAVE TO APPEAR

COMES NOW Union Electric Company d/b/a AmerenUE ("UE"), a Missouri corporation, and pursuant to 4 CSR 240-2.040(3)(c) hereby requests the Commission to grant leave to the law firm of Cooper & Kirk to appear and participate as co-counsel on behalf of UE in this case. In support of its motion, UE states as follows:

- 1. Mr. Robert J. Cynkar of the law firm Cooper & Kirk is a member in good standing of the bars of the states of Virginia (#23349) and Illinois (#00567140) and of the District of Columbia (#957845).
- 2. Mr. Victor J. Wolski of the law firm Cooper & Kirk is a member in good standing of the bars of the states of California (#159535), Washington (#23915), and Oregon (#96540) and of the District of Columbia (bar number pending).
- 3. Mr. Gordon D. Todd of the law firm Cooper & Kirk is a member in good standing of the bar of the state of Virginia (# 45934) and has been admitted to practice in the District of Columbia (oath of admission pending).

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- 4. None of the aforementioned attorneys or any member of the law firm Cooper & Kirk are disqualified to appear before any of the courts listed above.
- 5. Mr. James J. Cook is a member in good standing of the Missouri Bar (MBE #22697) and is currently and will continue to appear as an attorney of record for UE in this case.

  Mr. Cook's address is 1901 Chouteau Avenue, St. Louis, Missouri 63103.

WHEREFORE, for the foregoing reasons, Union Electric Company respectfully requests that the Commission grant permission to Mr. Robert J. Cynkar, Mr. Victor J. Wolski and Mr. Gordon D. Todd to appear and participate in conjunction with Mr. Cook as attorneys of record for Union Electric Company in this case.

Respectfully submitted,

UNION ELECTRIC COMPANY d/b/a AmerenUE

James J. Cook, MBE #22697

Managing Associate General Counsel

Ameren Services Company

One Ameren Plaza

1901 Chouteau Avenue

P.O. Box 66149 (MC 1310)

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Robert J. Cynkar

Victor J. Wolski

Gordon D. Todd

Cooper & Kirk

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Washington, D.C. 20005

202-220-9600

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202-220-9601 (fax)

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

The Staff of the Mi Service Commissio		)	
v. Union Electric Con AmerenUE,	npany, d/b/a Respondent.	) ) )	Case No. EC-2002-1
	AFFIDAV	TT OF GOO	DD STANDING
DISTRICT OF CO	LUMBIA	)	
CITY OF WASHII	NGTON	) SS. )	
1. My Kirk. 2. I he	name is Robert J. Cy	ynkar and I an	st duly sworn, deposes and states:  n an attorney with the law firm of Cooper &  other member of Cooper & Kirk are  es of Illinois, Virginia, California,
	egon, or in the Distri		
J			Robert J. Cynkar
Subscribed	and sworn to me thi	is <u>2714</u> day (	of November, 2001.  Mark C. Jirdan
	September 1	Manualland	Notary Public

My Commission Expires:



MARK C. JORDAN
Notary Public - State of Missouri
COUNTY OF COLE
My Commission Expires 10/29/2005

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

The Staff of the Miss Service Commission		)			
v. Union Electric Company, d/b/a AmerenUE, Respondent.		) ) )	Case No. EC-2002-1		
	<u>AFFIDAV</u>	IT OF GOO	D STANDING		
DISTRICT OF COL	UMBIA	) ) SS.			
CITY OF WASHING	GTON	)			
Victor J. Wo	lski, of lawful age a	and being firs	t duly sworn, deposes and states:		
1. My n	ame is Victor J. Wo	olski and I am	an attorney with the law firm of Cooper &		
Kirk.					
2. I here	2. I hereby certify that neither I nor any other member of Cooper & Kirk are				
disqualified to appear	ar in any of the cour	ts in the state	s of Illinois, Virginia, California,		
Washington or Oreg	on, or in the Distric	t of Columbi	a.		
			Turs W.A.		

Subscribed and sworn to me this 27 4 day of November, 2001.

My Commission Expires:



Mark C. Jwdan Notary Public

MARK C. JORDAN
Notary Public - State of Missouri
COUNTY OF COLE
My Commission Expires 10/29/2005

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

Service Comn	ne Missouri Public nission, Complainant, v. c Company, d/b/a Respondent.	) ) ) ) )	Case No. EC-2002-1					
	AFFIDAVIT OF GOOD STANDING							
DISTRICT O	F COLUMBIA	)						
CITY OF WA	SHINGTON	) SS. )						
Gordo 1. Kirk.		-	st duly sworn, deposes and states:  m an attorney with the law firm of Cooper &					
2.	I hereby certify that nei	ther I nor any	other member of Cooper & Kirk are					
disqualified to	o appear in any of the cou	ırts in the sta	es of Illinois, Virginia, California,					
Washington o	or Oregon, or in the Distri	ict of Columb	nia.					
			Gordon D. Todd					
Subsc	ribed and sworn to me th	is <u>274</u> day	of <u>November</u> , 2001.					
	And the state of t	JORONA TARLAN	Wark C. Swdan					

My Commission Expires:



MARK C. JORDAN
Notary Public - State of Missouri
COUNTY OF COLE
My Commission Expires 10/29/2005

### **CERTIFICATE OF SERVICE**

I her	eby certify th	at a copy of	the fore	egoing wa	is served v	ia first-c	lass, U.S.	mail, p	ostage
prepaid, to al	l parties of re	ecord on this	22	day of	Novin	6-	, 2001.	_	_

James J. Cook