



434 Fayetteville Street  
Suite 2800  
Raleigh, NC 27601  
Tel (919) 755-8700 Fax (919) 755-8800  
www.foxrothschild.com

KAREN M. KEMERAIT  
Direct No: 919.755.8764  
Email: kkemerait@foxrothschild.com

March 3, 2021

Ms. Kimberley A. Campbell, Chief Clerk  
North Carolina Utilities Commission  
430 N. Salisbury Street  
Raleigh, NC 27603

***RE: NCUC Docket Nos. W-1300, Sub 9; W-1300, Sub 55; W-1320,  
Sub 0; and W-1320, Sub 2***

Dear Ms. Campbell:

Attached please find the Motion for Substitution of Counsel requesting that Fox Rothschild LLP withdraw as counsel of record for Old North State Water Company, LLC and ONSWC-Chatham North, LLC and be substituted by Edward S. Finley, Jr. in the above-referenced dockets.

Should you have any questions concerning this filing, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'Karen M. Kemerait'.

Karen M. Kemerait

KK:bs

cc: All parties of record  
Enclosure

A Pennsylvania Limited Liability Partnership

California Colorado Delaware District of Columbia Florida Georgia Illinois Minnesota Nevada  
New Jersey New York North Carolina Pennsylvania South Carolina Texas Virginia Washington

STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH

DOCKET NO. W-1300, SUB 9  
DOCKET NO. W-1300, SUB 55  
DOCKET NO. W-1320, SUB 0  
DOCKET NO. W-1320, SUB 2

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. W-1300, SUB 9

In the Matter of  
Application to Transfer Certificate from Briar  
Chapel Utilities, LLC to Old North State Water  
Company, LLC

DOCKET NO. W-1300, SUB 55

In the Matter of  
Application for Transfer of Public Utility  
Franchise and for Approval of Rates at Briar  
Chapel Subdivision from Old North State  
Water Company to ONSWC-Chatham North,  
LLC

DOCKET NO. W-1320, SUB 0

In the Matter of  
Application for Transfer of Public Utility  
Franchise and for Approval of Rates at Briar  
Chapel Subdivision from Old North State  
Water Company to ONSWC- Chatham North,  
LLC

DOCKET NO. W-1320, SUB 2

In the Matter of  
Application for Transfer of Public Utility  
Franchise of Finch Creations dba Fearrington  
Utilities to ONSWC - Chatham North, LLC in  
Chatham Co. (Amended Purchaser)

MOTION FOR SUBSTITUTION  
OF COUNSEL

NOW COME the undersigned attorneys and hereby move the Commission,

pursuant to Commission Rules R1-7, R1-22, and R1-23 and in accordance with Rule 1.16 of the North Carolina Rules of Professional Conduct, for an order allowing Fox Rothschild LLP to withdraw as counsel of record for Old North State Water Company, LLC (“ONSWC”) and ONSWC-Chatham North, LLC (“ONSWC-Chatham North”) and for Edward S. Finley, Jr. to be substituted as counsel of record for ONSWC and ONSWC-Chatham North in the above-referenced dockets.

The undersigned attorneys represent that this motion is consented to, and at the direction of, ONSWC and ONSWC-Chatham North. The undersigned attorneys believe that the substitution of counsel can be accomplished without adverse effect on the interests of ONSWC and ONSWC-Chatham North, that good cause for the substitution of counsel exists, and that therefore justifiable cause exists to grant this motion.

The contact information for Edward S. Finley, Jr. is as follows:

Edward S. Finley, Jr., PLLC  
2024 White Oak Road  
Raleigh, North Carolina 27608  
Phone: 919-418-4516  
edfinley98@ aol.com

Edward S. Finley, Jr. consents to electronic service of documents and pleadings at the email address listed above.

WHEREFORE, the undersigned respectfully request that the Commission issue an order allowing Fox Rothschild LLP to withdraw as counsel of record for ONSWC and ONSWC-Chatham North, and Edward S. Finley, Jr. to be substituted as counsel of record for ONSWC and ONSWC-Chatham North, in the above-referenced dockets.

Respectfully submitted, this the 3<sup>rd</sup> day of March, 2021.

FOX ROTHSCHILD, LLP

/s/ Karen M. Kemerait

Karen Kemerait

Partner

Fox Rothschild LLP

434 Fayetteville Street

Suite 2800

Raleigh, NC 27601

(919) 755-8764 - direct

(919) 755-8800 - fax

[KKemerait@foxrothschild.com](mailto:KKemerait@foxrothschild.com)

[www.foxrothschild.com](http://www.foxrothschild.com)

/s/ Edward S. Finley, Jr.

Edward S. Finley, Jr.

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2024 White Oak Road

Raleigh, North Carolina 27608

(919) 418-4516

[edfinley98@ aol.com](mailto:edfinley98@aol.com)

### CERTIFICATE OF SERVICE

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing **MOTION FOR SUBSTITUTION OF COUNSEL OF RECORD** by first class mail deposited in the U.S. mail, postage pre-paid, or by email transmission to all parties of record.

This the 3<sup>rd</sup> day of March, 2021.

/s/ Karen M. Kemerait  
FOX ROTHSCHILD LLP  
Partner  
434 Fayetteville Street  
Suite 2800  
Raleigh, NC 27601  
(919) 755-8764 - direct  
(919) 755-8800 - fax  
[KKemerait@foxrothschild.com](mailto:KKemerait@foxrothschild.com)  
[www.foxrothschild.com](http://www.foxrothschild.com)