

**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

DOCKET NO. E-100, SUB 165

In the Matter of:	)	
2020 Biennial Integrated Resource Plans and	)	MOTION FOR LIMITED
Related 2020 REPS Compliance Plans	)	PRACTICE ON BEHALF OF
	)	HOWARD M. CRYSTAL

TO THE HONORABLE NORTH CAROLINA UTILITIES COMMISSION:

Pursuant to N.C. Gen. Stat. §§ 62-60 and 84-4.1 and Rule R1-22 of the North Carolina Utilities Commission's ("Commission"), Howard M. Crystal, Senior Attorney with the Center for Biological Diversity and an active member of the District of Columbia bar, respectfully requests that the Commission enter an Order admitting him to practice before the Commission for the purpose of appearing on behalf of the Center for Biological Diversity and NCWARN in the above-captioned proceeding. In support of this motion, Mr. Crystal alleges and states as follows:

1. Mr. Crystal is an attorney in good standing and licensed to practice in the District of Columbia, and will appear on behalf of the Center for Biological Diversity and NCWARN in the above-captioned proceeding.

2. Mr. Crystal's full name, address, and bar membership information are as follows:

Howard M. Crystal  
Senior Attorney  
Center for Biological Diversity  
1411 K Street, N.W. Suite 1300  
Washington, D.C. 20005  
202-809-6926  
[hcrystal@biologicaldiversity.org](mailto:hcrystal@biologicaldiversity.org)  
DC Bar. No. 446189; Mass. Bar. No. 565463

3. Unless permitted to withdraw sooner by order of the Commission, Mr. Crystal will continue to represent the Center for Biological Diversity and NCWARN in the above-captioned action until the final determination thereof with reference to all matters incident to such proceedings.

4. Mr. Crystal agrees to be subject to the orders and amenable to the disciplinary action and civil jurisdiction of the General Court of Justice and the North Carolina State Bar in all respects as if he were regularly admitted and a licensed member of the North Carolina State Bar in good standing.

5. The District of Columbia grants privileges of admission to members of the North Carolina State Bar in good standing.

6. Mr. Crystal has never been subject to public disciplinary action by any court or lawyer regulatory organization. He has never had a *pro hac vice* admission revoked. The statements required by N.C. Gen. Stat. § 84-4.1 are attached as Exhibit A to this motion.


7. Upon the Commission's issuance of an order granting this motion, the appropriate filings and fees will be made to the State Treasurer for support of the General Court of Justice and to the North Carolina State Bar as required by N.C. Gen. Stat. § 84-4.1.

WHEREFORE, the undersigned respectfully requests that the Commission enter an Order admitting Howard M. Crystal *pro hac vice* so that he may appear in this action along with Matthew Quinn on behalf of the Center for Biological Diversity and NCWARN.

Respectfully submitted this the <sup>th</sup>16 day of October, 2020.

By: /s/ Matthew D. Quinn  
Matthew D. Quinn  
N.C. State Bar No. 40004  
Lewis & Roberts, PLLC  
3700 Glenwood Avenue, Suite 410 (27612)  
P. O. Box 17529  
Raleigh, North Carolina 27619  
mdq@lewis-roberts.com  
919-981-0191 (t)  
919-981-0199 (f)

By:



---

Howard M. Crystal  
Center For Biological Diversity  
1411 K Street N.W., Suite 1300  
Washington, DC 20005  
hcrystal@biologicaldiversity.org  
202-809-6926

### CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing *Motion for Limited Practice* upon each of the parties of record in these proceedings on their attorneys of record by deposit in the U.S. Mail, postage prepaid, or by email transmission.

This the 16<sup>th</sup> day of October, 2020.

By: /s/ Matthew D. Quinn  
Matthew D. Quinn  
N.C. State Bar No. 40004  
Lewis & Roberts, PLLC  
3700 Glenwood Avenue, Suite 410 (27612)  
P. O. Box 17529  
Raleigh, North Carolina 27619  
mdq@lewis-roberts.com  
919-981-0191 (t)  
919-981-0199 (f)

# Exhibit A

**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

DOCKET NO. E-100, SUB 165

In the Matter of:	)	
2020 Biennial Integrated Resource Plans and	)	EXHIBIT A SUPPORTING MOTION
Related 2020 REPS Compliance Plans	)	FOR LIMITED PRACTICE ON
	)	BEHALF OF HOWARD M. CRYSTAL

TO THE HONORABLE NORTH CAROLINA UTILITIES COMMISSION:

I, Howard M. Crystal, hereby state that:

1. I am an attorney of law regularly admitted to practice and in good standing in the District of Columbia. My full name, address, and bar membership information are as follows:

Howard M. Crystal  
Senior Attorney  
Center for Biological Diversity  
1411 K Street, N.W. Suite 1300  
Washington, D.C. 20005  
202-809-6926  
hcrystal@biologicaldiversity.org  
DC Bar. No. 446189; Mass. Bar No. 565463

2. I am employed by the Center for Biological Diversity as a senior attorney and have been authorized to represent the Center for Biological Diversity and NCWARN in the above-captioned proceeding. The address of the Center for Biological Diversity's principal office in North Carolina is P.O. Box 6414, Asheville, NC 28801.

3. Unless permitted to withdraw sooner by order of the Commission, I will continue to represent the Center for Biological Diversity and NCWARN in the above-captioned action until the final determination thereof with reference to all matters incident to such proceedings.

4. With reference to all matters incident to the above-captioned proceeding, I agree to be subject to the orders and amenable to the disciplinary action and civil jurisdiction of the

Commission, the General Court of Justice and the North Carolina State Bar in all respects as if I were regularly admitted and a licensed member of the North Carolina State Bar in good standing.

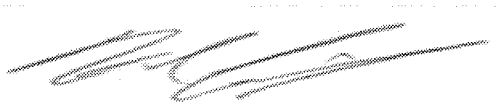
5. The District of Columbia, in which I am regularly admitted to practice, grants similar privileges to appear on a limited basis in judicial and regulatory proceedings being conducted in that jurisdiction to members of the North Carolina State Bar.

6. I have associated, for purposes of appearing and participating in Commission proceedings, with Matthew Quinn, who is a resident of North Carolina and is duly and legally admitted to practice in the General Court of Justice of North Carolina, upon whom service may be had in all matters connected with the above-captioned proceeding, or any disciplinary matter, with the same effect as if personally made on me within this State.

7. I have not been subject to public disciplinary action by any court or lawyer regulatory organization. I have never had a *pro hac vice* admission revoked.

8. I will have a check for \$25 submitted to the North Carolina State Bar and a check for \$200 to the State Treasurer when the motion is granted.

Respectfully submitted this the 16 day of October, 2020.

A handwritten signature in dark ink, appearing to read "Howard M. Crystal", is written over a horizontal line. The signature is enclosed in a rectangular box with a dotted border.

Howard M. Crystal