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May 17, 2004

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Frederick C. Lyon
Clerk of the Supreme Court
Idaho Supreme Court
451 West State Street
Post Office Box 83720
Boise, ID 83720-0101

Re: Citizens v. Qwest Corporation
MTBR&F File No. 15-881.15

Dear Clerk:

Enclosed for filing are the following original documents:

- Motion for Association of Foreign Counsel;
- Affidavit of Marc A. Paul in Support of Motion for Association of Foreign Counsel; and
- Affidavit of Alfred M. Mamlet in Support of Motion for Association of Foreign Counsel.

Please conform the first-page copies and return them in the envelope provided. Thank you for your assistance.

Very truly yours,

Carly J. Latimore
Administrative Assistant to
Morgan W. Richards, Jr.

/cjl

Enclosures

cc: All Counsel (w/encls.)

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2004 MAY 18 AM 8:25
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Morgan W. Richards, ISB No. 1913
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Boise, Idaho 83701
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Facsimile (208) 385-5384
mwr@moffatt.com
15-881.15

Attorneys for Illuminet, Inc.

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IDAHO PUBLIC
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IN THE SUPREME COURT OF THE STATE OF IDAHO

IDAHO TELEPHONE ASSOCIATION,
CITIZENS TELECOMMUNICATIONS
COMPANY OF IDAHO, CENTURYTEL OF
IDAHO, CENTURYTEL OF THE GEM
STATE, POTLATCH TELEPHONE
COMPANY and ILLUMINET, INC.,

Complainants-Respondents,

vs.

QWEST CORPORATION,

Respondent-Appellant.

Supreme Court No. 30107

**MOTION FOR ASSOCIATION
OF FOREIGN COUNSEL**

The undersigned Morgan W. Richards petitions the court to allow Marc A. Paul and Alfred M. Mamlet pursuant to Rule 9 of the Idaho Appellate Rules, to appear and argue before the Supreme Court in the above-captioned matter.

Applying counsel certify that they are licensed members, in good standing, of the Bar of the District of Columbia, and further support this motion by affidavits filed contemporaneously herewith.

Marc A. Paul and Alfred M. Mamlet maintain the regular practice of law at the following address: Steptoe & Johnson LLP, 1330 Connecticut Avenue, N.W., Washington D.C. 20036. They are not residents of the State of Idaho or licensed to practice in Idaho.

Undersigned counsel certifies that a copy of this motion has been served on all other parties to this matter and that a check in the amount of \$400 (\$200 per person) made payable to the Idaho State Bar and a copy of this motion are being delivered to the Idaho State Bar offices concurrently herewith, pursuant to Rule 222 of the Idaho Bar Commission Rules.

Morgan W. Richards certifies that the above information is true to the best of his knowledge, after reasonable investigation.

DATED this 17th day of May, 2004.

MOFFATT, THOMAS, BARRETT, ROCK &
FIELDS, CHARTERED

By Morgan W. Richards
Morgan W. Richards – Of the Firm
Attorneys for Illuminet, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 17th day of May, 2004, I caused a true and correct copy of the foregoing **MOTION FOR ASSOCIATION OF FOREIGN COUNSEL** to be served by the method indicated below, and addressed to the following:

Mary S. Hobson
STOEL RIVES LLP
101 South Capitol Boulevard, Suite 1900
Boise, Idaho 83702-5958
Fax: (208) 389-9040

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Stephanie Boyett-Colgan
QWEST SERVICES CORPORATION
1801 California Street – 47th Floor
Denver, Colorado 80202
Fax: (303) 896-8120

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Charles W. Steese
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6400 South Fiddlers Green Circle, Suite 1820
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Weldon Stutzman
Deputy Attorney General
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Boise, Idaho 83720-007

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Attorneys for Illuminet, Inc.

IN THE SUPREME COURT OF THE STATE OF IDAHO

IDAHO TELEPHONE ASSOCIATION,
CITIZENS TELECOMMUNICATIONS
COMPANY OF IDAHO, CENTURYTEL OF
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STATE, POTLATCH TELEPHONE
COMPANY and ILLUMINET, INC.,

Complainants-Respondents,

vs.

QWEST CORPORATION,

Respondent-Appellant.

Supreme Court No. 30107

**AFFIDAVIT OF MARC A. PAUL IN
SUPPORT OF MOTION FOR
ASSOCIATION OF FOREIGN
COUNSEL**

Washington D.C.)
) ss.
)

MARC A. PAUL, of Washington, D.C. hereby declares as follows:

1. I am an attorney residing in Maryland, and I practice law with the law firm of Steptoe & Johnson LLP, 1330 Connecticut Avenue, N.W., Washington D.C. 20036. I am a

member in good standing of the Bar of the District of Columbia and have also been admitted to practice in the following courts of the United States: the courts of the Commonwealth of Pennsylvania.

2. I am a member in good standing and eligible to practice in each of the foregoing courts and have not been suspended or disbarred in any court.

3. I hereby designate Morgan W. Richards of the firm Moffatt, Thomas, Barrett, Rock & Fields, Chartered, P. O. Box 829, Boise, Idaho, 83701, who maintains an office in the state of Idaho, as co-counsel and with authority to act as attorney of record for all purposes.

I declare, under penalty of perjury of the laws of the United States, that the foregoing is true and correct.



Marc A. Paul

SUBSCRIBED AND SWORN to before me this 14 day of May, 2004.


City of Washington, District of Columbia
NOTARY PUBLIC FOR _____
Residing at _____
My Commission Expires 5-31-06

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 17th day of May, 2004, I caused a true and correct copy of the foregoing **AFFIDAVIT OF MARC A. PAUL IN SUPPORT OF MOTION FOR ASSOCIATION OF FOREIGN COUNSEL** to be served by the method indicated below, and addressed to the following:

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STOEL RIVES LLP
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Boise, Idaho 83702-5958
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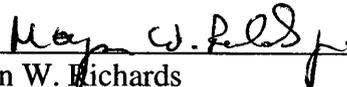
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Deputy Attorney General
IDAHO PUBLIC UTILITIES COMMISSION
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Thomas J. Moorman
KRASKIN, LESSE & COSSON, LLC
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Fax: (202)296-8893

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Morgan W. Richards

COPY

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Attorneys for Illuminet, Inc.

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COMPANY OF IDAHO, CENTURYTEL OF
IDAHO, CENTURYTEL OF THE GEM
STATE, POTLATCH TELEPHONE
COMPANY and ILLUMINET, INC.,

Complainants-Respondents,

vs.

QWEST CORPORATION,

Respondent-Appellant.

Supreme Court No. 30107

**AFFIDAVIT OF ALFRED M. MAMLET
IN SUPPORT OF MOTION FOR
ASSOCIATION OF FOREIGN
COUNSEL**

Washington D.C.)
) ss.
)

ALFRED M. MAMLET, of Washington, D.C. hereby declares as follows:

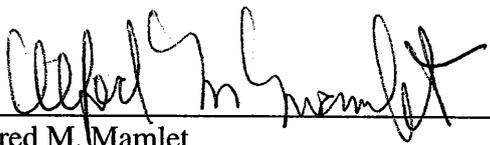
1. I am an attorney residing in Maryland, and I practice law with the law firm of Steptoe & Johnson LLP, 1330 Connecticut Avenue, N.W., Washington D.C. 20036.

I am a member in good standing of the Bar of the District of Columbia and have also been admitted to practice in the following courts of the United States: the U.S. District Court for the District of Columbia, the U.S. District Court for the Northern District of California, the U.S. Court of Appeals for the District of Columbia Circuit and the U.S. Court of Appeals for the Fourth Circuit.

2. I am a member in good standing and eligible to practice in each of the foregoing courts and have not been suspended or disbarred in any court.

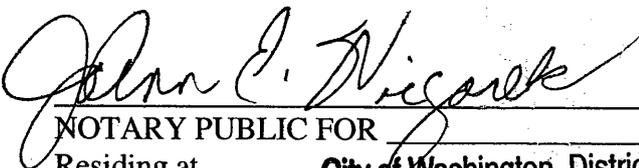
3. I hereby designate Morgan W. Richards of the firm Moffatt, Thomas, Barrett, Rock & Fields, Chartered, P. O. Box 829, Boise, Idaho, 83701, who maintains an office in the state of Idaho, as co-counsel and with authority to act as attorney of record for all purposes.

I declare, under penalty of perjury of the laws of the United States, that the foregoing is true and correct.



Alfred M. Mamlet

SUBSCRIBED AND SWORN to before me this 14 day of May, 2004.



NOTARY PUBLIC FOR _____
Residing at _____ City of Washington, District of Columbia
My Commission Expires 5-31-06

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 17th day of May, 2004, I caused a true and correct copy of the foregoing **AFFIDAVIT OF ALFRED M. MAMLET IN SUPPORT OF MOTION FOR ASSOCIATION OF FOREIGN COUNSEL** to be served by the method indicated below, and addressed to the following:

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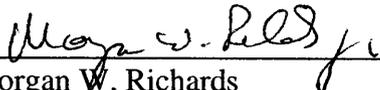
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