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# Moffatt Thomas

MOFFATT THOMAS BARRETT ROCK & FIELDS, CHTD.

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*Willis C. Moffatt, 1907-1980*  
*Kirk R. Helvie, 1956-2003*

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October 28, 2003

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 Thomas J. Moorman in Support of Motion for Association of Foreign Counsel
- Affidavit of David Cosson in Support of Motion for Association of Foreign Counsel
- Notice of Appearance

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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mwr@moffatt.com  
15-881.15

Attorneys for Illuminet, Inc.

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 Thomas J. Moorman and David Cosson 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.

Thomas J. Moorman and David Cosson maintain the regular practice of law at the following address: Kraskin, Lesse & Cosson LLP, 2120 L Street, N.W., Washington, D.C. 20037. 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.

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

DATED this 28 day of October, 2003.

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 28 day of October, 2003, 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

U.S. Mail, Postage Prepaid  
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 Facsimile

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

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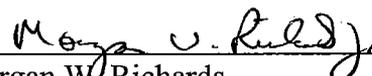
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Weldon Stutzman  
Deputy Attorney General  
IDAHO PUBLIC UTILITIES COMMISSION  
Post Office Box 83720  
Boise, Idaho 83720-007

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Thomas J. Moorman  
KRASKIN, LESSE & COSSON, LLC  
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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 THOMAS J.  
MOORMAN IN SUPPORT OF  
MOTION FOR ASSOCIATION OF  
FOREIGN COUNSEL**

Washington D.C.     )  
                          ) ss.  
                          )

**THOMAS J. MOORMAN**, of Washington, D.C. hereby declares as follows:

1. I am an attorney residing in Springfield, Virginia, and I practice law with the law firm of Kraskin, Lesse & Cosson LLC, 2120 L Street, N.W., Suite 520, Washington,

**AFFIDAVIT OF THOMAS J. MOORMAN IN SUPPORT  
OF MOTION FOR ASSOCIATION OF FOREIGN COUNSEL - 1**

D.C. 20037. 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:

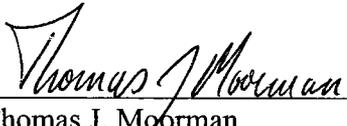
United States Court of Appeals for the District of Columbia Circuit

District of Columbia Court of Appeals

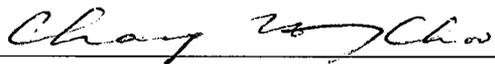
2. I am a member in good standing and eligible to practice in each of the foregoing courts and have not been suspended or disbarred in any court.

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.

  
\_\_\_\_\_  
Thomas J. Moorman

SUBSCRIBED AND SWORN to before me this 24<sup>th</sup> day of October, 2003.

  
\_\_\_\_\_  
NOTARY PUBLIC FOR CHANG HO CHOI, NOTARY PUBLIC  
Residing at \_\_\_\_\_ DISTRICT OF COLUMBIA  
My Commission Expires COMMISSION EXPIRES: 6/14/2004

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 28 day of October, 2003, I caused a true and correct copy of the foregoing **AFFIDAVIT OF THOMAS J. MOORMAN IN SUPPORT OF 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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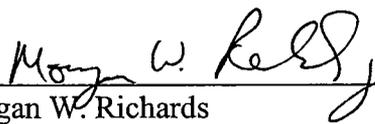
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Deputy Attorney General  
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Attorneys for Illuminet, Inc.

IN THE SUPREME COURT OF THE STATE OF IDAHO

IDAHO TELEPHONE ASSOCIATION,  
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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 DAVID COSSON IN  
SUPPORT OF MOTION FOR  
ASSOCIATION OF FOREIGN  
COUNSEL**

Washington D.C.     )  
                              ) ss.  
                              )

**DAVID COSSON**, of Washington, D.C. hereby declares as follows:

1. I am an attorney residing in Potomac, Maryland, and I practice law with the law firm of Kraskin, Lesse & Cosson LLC, 2120 L Street, N.W., Suite 520 Washington, D.C.

20037. 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:

United States Supreme Court

United States Courts of Appeal for the District of Columbia, 8th, 9th, 10th, & 11th Circuits

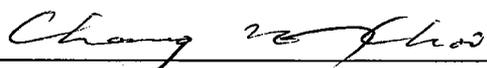
2. I am a member in good standing and eligible to practice in each of the foregoing courts and have not been suspended or disbarred in any court.

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.

  
\_\_\_\_\_  
David Cosson

SUBSCRIBED AND SWORN to before me this 24<sup>th</sup> day of October, 2003.

  
\_\_\_\_\_  
NOTARY PUBLIC FOR \_\_\_\_\_ CHANG HO CHOI, NOTARY PUBLIC  
Residing at \_\_\_\_\_ DISTRICT OF COLUMBIA  
My Commission Expires \_\_\_\_\_ COMMISSION EXPIRES: 6/14/2004

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 28 day of October, 2003, I caused a true and correct copy of the foregoing **AFFIDAVIT OF DAVID COSSON IN SUPPORT OF 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  
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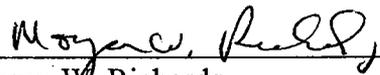
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Weldon Stutzman  
Deputy Attorney General  
IDAHO PUBLIC UTILITIES COMMISSION  
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Complainants-Respondents,

vs.

QWEST CORPORATION,

Respondent-Appellant.

Supreme Court No. 30107

**NOTICE OF APPEARANCE**

NOTICE IS HEREBY GIVEN that Morgan W. Richards of Moffatt, Thomas, Barrett, Rock & Fields, Chartered, hereby enters his appearance on behalf of Complainant-Respondent Illuminet, Inc. and Complainant-Respondent Citizens Telecommunications Company of Idaho. Request is also made that notice of all hearings, pleadings and other papers in this matter be given to the undersigned counsel by mailing such to Morgan W. Richards,

Moffatt, Thomas, Barrett, Rock & Fields, Chartered, 101 South Capitol Boulevard, 10th Floor,  
Post Office Box 829, Boise, Idaho 83701.

DATED this 28 day of October, 2003.

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 27 day of October, 2003, I caused a true and correct copy of the foregoing **NOTICE OF APPEARANCE** 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  
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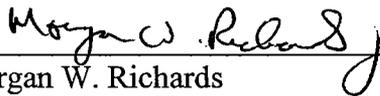
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