

**Virginia State Corporation Commission
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| Case Name (if known) | Petition of Chickahominy Pipeline, LLC |
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COMMONWEALTH OF VIRGINIA
Before the
STATE CORPORATION COMMISSION

PETITION OF)
)
CHICKAHOMINY PIPELINE, LLC) CASE NO. PUR-2021-00211
)
For a declaratory judgment)

MOTION OF CHICKAHOMINY PIPELINE, LLC
FOR SUBSTITUTION OF COUNSEL

Pursuant to the Rules of Practice and Procedure of the State Corporation Commission (“Commission”), 5 VAC § 20-110, Chickahominy Pipeline, LLC (“Chickahominy”) hereby files its motion for substitution of counsel in the above-captioned docket.

Chickahominy commenced this proceeding by filing a Petition for Declaratory Judgment and Request for Expedited Consideration (“Petition”) on September 3, 2021. The Commission issued a Final Order denying the Petition on December 22, 2021. Chickahominy sought reconsideration of the December 22, 2021 Final Order on January 11, 2022, and the Commission granted reconsideration by Order dated January 12, 2022. In the January 12, 2022 Order, the Commission suspended the December 22, 2021 order pending reconsideration.

Chickahominy hereby moves to substitute Betty S.W. Graumlich (VSB No. 30825) in place of its initial counsel of record. Chickahominy’s initial counsel of record was:

Eric M. Page, Esq.
Cody T. Murphy, Esq.
Eckert Seamons Cherin & Mellott, LLC
919 East Main Street, Suite 1300
Richmond, Virginia 23219

In addition to Ms. Graumlich, Chickahominy seeks to add Debra Ann Palmer as counsel in this proceeding. Mss. Graumlich and Palmer are with the law firm of Reed Smith LLP.¹ Ms.

¹ Ms. Palmer is an associate member of the Virginia State Bar (VSB No. 27693).

Graumlich will represent Chickahominy as the Commission reconsiders the December 22, 2021 order.

For the foregoing reasons, Chickahominy respectfully requests the Commission to grant this motion for substitution of counsel.

Respectfully submitted,

/s/ Betty S.W. Graumlich
Betty S.W. Graumlich (VSB No. 30825)
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Dated: January 13, 2022

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CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of January, 2022, a true copy of the foregoing was sent via electronic mail to:

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