



KNOLL LEIBEL ^{LLP}
ATTORNEYS AT LAW

May 16, 2024

VIA U.S. & E-MAIL ONLY: ndpsc@nd.gov

Steve Kahl
Executive Secretary
North Dakota Public Service Commission
State Capitol
600 E Boulevard Ave, Dept 408
Bismarck, ND 58505-0480

RE: In the Matter of the Application of SCS Carbon Transport LLC for
Certificate of Corridor Compatibility and Route Permit for the Midwest
Carbon Express
Case No.: PU-22-391

Dear Mr. Kahl:

Enclosed for filing please find the following documents:

1. Expedited Motion to Appear without Local Counsel; and
2. Declaration of Service.

This Motion is being filed with the North Dakota Public Service Commission (hereinafter "NDPSC") on behalf of the Intervenor represented by Knoll Leibel LLP. These Intervenor have a direct and substantial interest in these proceedings, as well as legal property rights which may be substantially affected by NDPSC's findings and conclusions.

Sincerely,

KNOLL LEIBEL LLP

Steven J. Leibel
steve@bismarck-attorneys.com

SJL: rmo

Enclosures

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Expedited Motion to Appear without Local Counsel

Knoll Leibel, LLP, on behalf and at the request of Intervenor
Steven Leibel, Attorney

Steven J. Leibel, Partner

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Mr. Jorde be allowed to appear at the Wahpeton hearings on May 24, 2024 without designated associate counsel.

[5] As a basis for this motion, Landowner Intervenor state that permitting Mr. Jorde to appear without designated associate counsel is intended to save the costs and fees associated with having Attorney Leibel travel from Bismarck to Wahpeton and attend the hearing.

[6] There will be no prejudice to any party to this proceeding arising from Mr. Jorde appearing without associate counsel. Mr. Jorde is lead counsel for intervenors and has been fully involved in this process. He has demonstrated that he is competent and able to comply with all norms of practice in front of the Commission.

WHEREFORE, Intervenor respectfully request that the Commission issue an expedited Order permitting Attorney Brian Jorde to appear without local counsel (Steven Leibel and David Knoll) for the hearing scheduled on May 24, 2024 in Wahpeton, and for such other relief deemed just and proper.

Dated this 16th day of May, 2024.



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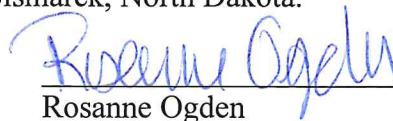
[3] and by sending the originals and seven (7) copies of said documents via U.S. Mail, at Bismarck, North Dakota with postage prepaid, to the following:

Steve Kahl
Executive Secretary
North Dakota Public Service Commission
State Capitol
600 E Boulevard Ave, Dept 408
Bismarck, ND 58505-0480

[4] The addresses of each party served are the last reasonably ascertainable e-mail address and post office address of such party.

[5] I declare, under penalty of perjury under the law of North Dakota, that the foregoing is true and correct.

Signed on the 16th day of May, 2024 at Bismarck, North Dakota.



Rosanne Ogden