

**BEFORE THE PUBLIC SERVICE COMMISSION OF NEBRASKA**

<b>IN THE MATTER OF THE JOINT</b>	)	
<b>APPLICATION OF NORTHWESTERN</b>	)	
<b>ENERGY PUBLIC SERVICE CORPORATION,</b>	)	<b>Application No. NG-128</b>
<b>BLACK HILLS CORPORATION, AND</b>	)	
<b>NORTHWESTERN ENERGY GROUP, INC. FOR</b>	)	
<b>APPROVAL OF MERGER</b>	)	

**MOTION FOR ADMISSION OF DANIELLE FRANCO-MALONE *PRO HAC VICE***

Ryan M. Kunhart, counsel for Laborers International Union of North America (LIUNA), pursuant to 291 Neb. Admin. Code CH 1§ 002.04B, moves the Nebraska Public Service Commission (Commission) for an Order admitting Danielle Franco-Malone *pro hac vice* for the purpose of entering her appearance on behalf of LIUNA in this matter.

In support of this Motion, Ryan M. Kunhart, as an attorney duly admitted and eligible to practice law in Nebraska, states as follows:

1. Danielle Franco-Malone is an active member in good standing of the Washington State Bar. She was admitted to practice law in Washington under Washington Bar #40979 on and after January 23, 2009.
2. Danielle Franco-Malone is not the subject of a disciplinary action or investigation.
3. Danielle Franco-Malone, upon admission *pro hac vice*, will be subject to the Rules of Professional Conduct, NEB. CT. R. of Prof. Cond. §§ 3-501.0 to 3-508.5.
4. Danielle Franco-Malone has associated with the following attorney who is duly and regularly admitted to practice in the courts of record of this state, and upon whom service may be had in all matters connected with the above-captioned case: Ryan M. Kunhart of Dvorak Law Group, LLC, Nebraska Bar #24692.

5. In support of this Motion, the Affidavit of Danielle Franco-Malone is attached, as well as her Certificate of Good Standing.

FOR THE ABOVE REASONS, Ryan M. Kunhart respectfully moves this Commission for admission *pro hac vice* of Danielle Franco-Malone to practice and participate in the present proceeding.

DATED this 25th of March, 2026.

**LABORERS INTERNATIONAL UNION  
OF NORTH AMERICA**

By: /s/ Ryan M. Kunhart  
Ryan M. Kunhart, NE Bar #24692  
Dvorak Law Group, LLC  
9500 W. Dodge Rd., Ste. 100  
Omaha, NE 68114  
Office: (402) 933-3079  
Cell: (402) 910-6986  
rkunhart@ddlawgroup.com

**CERTIFICATE OF SERVICE**

I hereby certify that on this 26th of March, 2026, the forgoing **Motion for Admission of Danielle Franco-Malone Pro Hac Vice** was served electronically on the following entities at the email addresses shown below:

<b>Nebraska Public Service Commission</b>	
<b>Gregory Walklin</b> <a href="mailto:gregory.walklin@nebraska.gov">gregory.walklin@nebraska.gov</a>	<b>Nichole Mulcahy</b> <a href="mailto:nichole.mulcahy@nebraska.gov">nichole.mulcahy@nebraska.gov</a>
<b>Deena Ackerman</b> <a href="mailto:deena.ackerman@nebraska.gov">deena.ackerman@nebraska.gov</a>	<b>Jonathan Smith</b> <a href="mailto:jon.smith@nebraska.gov">jon.smith@nebraska.gov</a>
<b>Alex Timperley</b> <a href="mailto:alex.timperley@nebraska.gov">alex.timperley@nebraska.gov</a>	<b>Vincent Musco</b> <a href="mailto:Vincent.musco@bateswhite.com">Vincent.musco@bateswhite.com</a>
<b>Karen Morgan</b> <a href="mailto:Karen.Morgan@bateswhite.com">Karen.Morgan@bateswhite.com</a>	<b>Jim DeMetro</b> <a href="mailto:Jdemetro60@gmail.com">Jdemetro60@gmail.com</a>
<b>Nebraska Public Advocate</b>	
<b>Chris Dibbern</b> <a href="mailto:dibbernlawfirm@gmail.com">dibbernlawfirm@gmail.com</a>	<b>Derek Aldridge</b> <a href="mailto:daldridge@perrylawfirm.com">daldridge@perrylawfirm.com</a>
<b>David Brevita</b> <a href="mailto:dbrevitz@gmail.com">dbrevitz@gmail.com</a>	
<b>Laborers International Union of North America</b>	
<b>Danielle Franco-Malone</b> <a href="mailto:franco@workerlaw.com">franco@workerlaw.com</a>	<b>Elinor Engle</b> <a href="mailto:engle@workerlaw.com">engle@workerlaw.com</a>
<b>Melana Dayanim</b> <a href="mailto:dayanim@workerlaw.com">dayanim@workerlaw.com</a>	
<b>Black Hills Corporation</b>	
<b>Douglas Law</b> <a href="mailto:douglas.law@blackhillscorp.com">douglas.law@blackhillscorp.com</a>	<b>Cathy Sabers</b> <a href="mailto:cathy.sabers@blackhillscorp.com">cathy.sabers@blackhillscorp.com</a>
<b>Nick Wagner</b> <a href="mailto:nick.wagner@blackhillscorp.com">nick.wagner@blackhillscorp.com</a>	<b>Brooke Bassell-Herman</b> <a href="mailto:brooke.bassellherman@blackhillscorp.com">brooke.bassellherman@blackhillscorp.com</a>
<b>Becky Purington</b> <a href="mailto:becky.purington@blackhillscorp.com">becky.purington@blackhillscorp.com</a>	<b>Caitlin Shields</b> <a href="mailto:cshields@wbklaw.com">cshields@wbklaw.com</a>
<b>NorthWestern and NorthWestern Group</b>	
<b>Andy S. Pollock</b> <a href="mailto:apollock@remboltlawfirm.com">apollock@remboltlawfirm.com</a>	<b>Shannon M. Heim</b> <a href="mailto:shannon.heim@northwestern.com">shannon.heim@northwestern.com</a>
<b>Sarah N. Norcott</b> <a href="mailto:sarah.norcott@northeastern.com">sarah.norcott@northeastern.com</a>	<b>Michael W. Green</b> <a href="mailto:michael.green@northwestern.com">michael.green@northwestern.com</a>
<b>Pam Bonrud</b> <a href="mailto:pam.bonrud@northeastern.com">pam.bonrud@northeastern.com</a>	<b>Jeffrey Decker</b> <a href="mailto:jeffrey.decker@northwestern.com">jeffrey.decker@northwestern.com</a>

By: /s/ Ryan M. Kunhart

BEFORE THE PUBLIC SERVICE COMMISSION OF NEBRASKA

IN THE MATTER OF THE JOINT )
APPLICATION OF NORTHWESTERN )
ENERGY PUBLIC SERVICE CORPORATION, ) Application No. NG-128
BLACK HILLS CORPORATION, AND )
NORTHWESTERN ENERGY GROUP, INC. FOR )
APPROVAL OF MERGER )

AFFIDAVIT OF DANIELLE FRANCO-MALONE FOR ADMISSION PRO HAC VICE

State of Washington )
) ss.
County of King )

I, Danielle Franco-alone, desiring admission pro hac vice, affirm as follows:

1. I am a senior partner in the firm Barnard Iglitzin & Lavitt LLP and will be representing Laborers International Union of North America (LIUNA) in this matter.

2. I am licensed to practice law in the State of Washington under bar number 40979.

3. I have been a member of the Washington State Bar Association since my admission to the bar in January 23, 2009. I am in good standing and eligible to practice law in Washington. I am not the subject of any disciplinary acts or investigations. My Certificate of Good Standing is attached hereto.

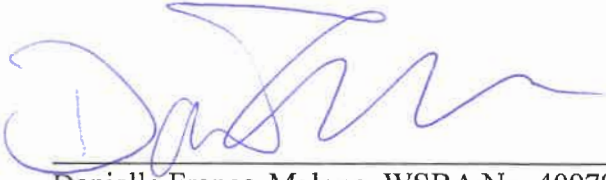
4. Upon admission pro hac vice, I will be subject to the Rules of Professional Conduct, Neb. Ct. R. of Prof. Cond. §§ 3-501.0 to 3-508.5.

5. I will be associating with Ryan M. Kunhart, counsel for LIUNA. He is a member of the Nebraska bar, duly and regularly admitted to practice in the courts of this state. All service in this matter may be directed through him. His contact information is as follows:

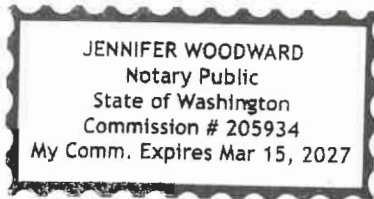
Ryan M. Kunhart, NE Bar #24692
Dvorak Law Group, LLC
9500 W. Dodge Rd., Ste. 100
Omaha, NE 68114

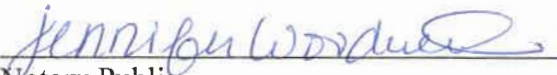
Office: (402) 933-3079  
Cell: (402) 910-6986  
rkunhart@ddlgroup.com

DATED this 25th day of March, 2026.

  
Danielle Franco-Malone, WSBA No. 40979

Subscribed and sworn before me this 24 of March, 2026.



  
Notary Public

My Commission Expires: 03/15/2027

**IN THE SUPREME COURT OF THE STATE OF WASHINGTON**

IN THE MATTER OF THE ADMISSION	)	BAR NO. 40979
	)	
OF	)	<b>CERTIFICATE</b>
	)	
DANIELLE ELIZABETH FRANCO-MALONE	)	<b>OF</b>
	)	
TO PRACTICE IN THE COURTS OF THIS STATE	)	<b>GOOD STANDING</b>
	)	
_____	)	

I, Sarah R. Pendleton, Clerk of the Supreme Court of the State of Washington, hereby certify

**DANIELLE ELIZABETH FRANCO-MALONE**

was regularly admitted to practice as an Attorney and Counselor at Law in the Supreme Court and all the Courts of the State of Washington on December 4, 2008, and is now and has continuously since that date been an attorney in good standing, and has a current status of active.



IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seal of this Court on the 24<sup>th</sup> day of March, 2026.

Sarah R. Pendleton  
Supreme Court Clerk  
Washington State Supreme Court