

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re:)	Chapter 11
)	
FIRSTENERGY SOLUTIONS CORP., <i>et al.</i> , ¹)	Case No. 18-50757
)	(Jointly Administered)
Debtors.)	
)	
)	Hon. Judge Alan M. Koschik
)	

**DECLARATION OF DISINTERESTEDNESS IN SUPPORT
OF EMPLOYMENT OF ZEIGER, TIGGES & LITTLE LLP AS A
PROFESSIONAL UTILIZED IN THE ORDINARY COURSE OF BUSINESS**

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the following is true and correct:

1. I am a partner of the firm Zeiger, Tigges & Little LLP (the “Firm”), which maintains offices at the address and phone number listed below:

Address: 41 South High Street, Suite 3500, Columbus, Ohio 43215

Phone: (614) 365-9900

2. The Firm has been employed by Debtor FirstEnergy Solutions Corp. (“FESC”) to render services to one or more of the debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “Debtors”) in the ordinary course of their business. The Debtors wish to retain the Firm to continue providing ordinary course services during their chapter 11 cases. This declaration (the “Declaration of Disinterestedness”) is submitted in

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: FE Aircraft Leasing Corp. (9245), case no. 18-50759; FirstEnergy Generation, LLC (0561), case no. 18-50762; FirstEnergy Generation Mansfield Unit 1 Corp. (5914), case no. 18-50763; FirstEnergy Nuclear Generation, LLC (6394), case no. 18-50760; FirstEnergy Nuclear Operating Company (1483), case no. 18-50761; FirstEnergy Solutions Corp. (0186); and Norton Energy Storage L.L.C. (6928), case no. 18-50764. The Debtors’ address is: 341 White Pond Dr., Akron, OH 44320.

compliance with the *Order Authorizing the Debtors to Employ and Compensate Professionals Utilized in the Ordinary Course of Business* (the “OCP Order”) [Docket No. 428].

3. I am familiar with and have personal knowledge of the facts set forth below.

4. Since on or about June 26, 2019, the Debtors have requested that the Firm provide litigation advice and, if necessary, litigation services regarding pending legislation, and the Firm has agreed to provide such services. The Firm has not provided services to the Debtors or any non-debtor affiliates prior to the Petition Date. The Firm, through me, and other members, partners, associates, or employees of the Firm, has provided, and plans to provide, the following services to the Debtors from and after the Petition Date: litigation advice and, if necessary, litigation services regarding pending legislation.

5. Neither I, the Firm, nor any partner, or associate thereof, insofar as I have been able to ascertain, has any connection with the Debtors, their creditors or stockholders, or any party in interest herein, except as set forth hereinafter: The Firm currently represents the following entities identified on the Schedule of Searched Parties, and/or entities affiliated with such entities, in matters unrelated to these chapter 11 cases: Duke Energy Ohio, Inc., Fifth Third Bank, Fifth Third Securities, Inc., JPMorgan Chase N.A., JP Morgan Securities, LLC, Aon Finance Services Group, Aon Premium Finance, LLC, Aon Risk Services, Inc. of Florida, PVS Chemical Solutions Incorporated, and Berkshire Hathaway Specialty Insurance Company.

6. To the best of my knowledge, information, and belief, formed after due inquiry, (a) except for the proposed retention of the Firm in these chapter 11 cases, the Firm does not currently provide services to any party in any matter related to these chapter 11 cases, and (b) the Firm does not represent or hold an interest adverse to the Debtors.

7. The Firm does not hold a retainer applicable to post-petition services.

8. The Firm does not represent the Debtors on a contingency fee basis.

9. This Firm and certain of its partners and associates may have in the past represented, currently represent, and may in the future represent other entities that are claimants or equity security holders of the Debtors in matters totally unrelated to the Debtors' chapter 11 cases. Prior to the engagement described herein, the Firm has not represented FESC or any of its affiliates in any matters. The Firm will be compensated for professional services rendered to one or more of the Debtors in accordance with the Compensation Procedures set forth in the OCP Order, based on the hourly rates set forth below, plus reimbursement of actual necessary expenses and other charges incurred by the Firm. The principal professionals designated to represent the Debtors and their current standard rates are: John W. Zeiger (\$850 per hour) and Marion H. Little, Jr. (\$695 per hour).

10. The rates set forth above are subject to periodic adjustments to reflect economic and other conditions. Such rates are the Firm's standard rates for a one time, single case representation of this nature. The rates are set at a level designed to fairly compensate the Firm for the work of its professionals and to cover fixed and routine overhead expenses. It is the Firm's policy to charge its clients in all areas of practice for all other expenses incurred in connection with a client's matter. The expenses charged to clients include, among other things, computerized research, copying, travel expenses, filing fees and, in general, all identifiable expenses that would not have been incurred except for representation of a particular client. The Firm will charge the Debtors for these expenses in a manner and at rates consistent with charges made generally to the Firm's other clients.

11. Except as provided in the OCP Order, no representations or promises have been received by the Firm nor by any partner or associate thereof as to compensation in connection

with these cases other than in accordance with the provisions of title 11 of the United States Code. The Firm has no agreement with any other entity to share with such entity any compensation received by the Firm in connection with these chapter 11 cases.

12. If, at any time during its employment by the Debtors, the Firm should discover any facts bearing on the matters described herein, the Firm will supplement the information contained in this Declaration of Disinterestedness.

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

A handwritten signature in black ink, appearing to read "John W. Zeiger", is written over a horizontal line.

John W. Zeiger, Esq.

Partner

ZEIGER, TIGGES & LITTLE LLP

3500 Huntington Center

41 South High Street

Columbus, Ohio 43215