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SECRETARY'S BUREAU

September 13, 2011


Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission

RE: Richard Ryan v. Verizon Pennsylvania, Inc.;
Docket No. C-2009-2135745

Dear Secretary Chiavetta,

I have enclosed for filing Complainant's Motion to Compel
Third Request for Production of Documents along with a
Certificate of Service. Would you kindly file this on my behalf.

Sincerely,



Robert C. Cohen
Attorney for Richard Ryan, Complainant

cc: William E. Lehman
w/enclosures

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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SECRETARY'S

Richard Ryan,

v.

Docket No. C-2009-2135745

Verizon Pennsylvania, Inc.,

**COMPLAINANT'S MOTION TO COMPEL THIRD REQUEST FOR
PRODUCTION OF DOCUMENTS**

Robert C. Cohen, Esq. files Complainant's Motion to Compel Third Request for Production of Documents. Attached hereto as Exhibit **A** is Complainant's Third Request for Production of Documents.

A. Third Request for Production of Documents

Request No. 1

Respondent's entire record of calls and billing for the telephone# 215 266 0977, August 1, 2006 to end of Verizon service.

Argument

Respondent has failed to object and has failed to produce the record of calls and billing documents related to requests for service by Complainant and calls to Complainant by Verizon service personnel for the period August 2006 to November 2009 when Complainant's telephone # at 310 S. Juniper was 215 266 0977.

All of Complainant's Third Request for Production of Documents is properly directed to the reasonable service issue referred to in Order #4.

Complainant's request does not expand the scope of the proceedings,

but rather carefully relates to the lack of reasonable service to

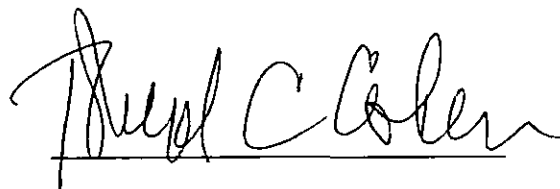
Complainant and these documents verify the Interrogatories

requested of Complainant by Verizon. Reasonable service includes the discriminatory service to Complainant.

Thus, Complainant's discovery request is directed solely and exclusively to information related to reasonable service problems experienced by Complainant as follows:

1. Fraudulent and or misleading representations to Complainant by Verizon regarding the removal of the offending wires in question.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Robert C. Cohen", written over a horizontal line.

Robert C. Cohen, Esq.
Attorney for Richard Ryan, Complainant

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Richard Ryan,
SECRETARY

BEFORE THE

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Complainant

v.

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Verizon Pennsylvania, Inc.,
Respondent

CERTIFICATE OF SERVICE

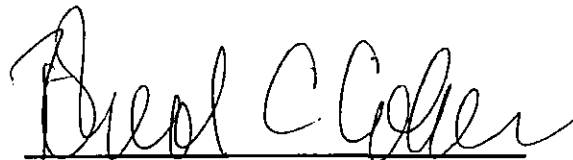
I, Robert C. Cohen, Esquire certify that I have this 13th day of September, 2011 served a true copy of the foregoing Motion to Compel Third Request for Production of Documents upon Counsel for Respondent and others as listed below.

SERVICE VIA FIRST CLASS MAIL

The Honorable Cynthia W. Fordham
Administrative law Judge
Pennsylvania Public Utility Commission
801 Market Street
Suite 4063 Philadelphia, PA 19107

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Todd S. Stewart, Esq.
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100 North Tenth Street
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Harrisburg, PA 17105-1778

Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street - Filing Room (2 North)
Harrisburg, PA 17120



Robert C. Cohen, Esq. (02727)

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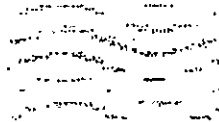
Norristown, PA 19401

Attorney for Complainant, Richard Ryan

**Richard Ryan
310 S. Juniper
Philadelphia, PA 19107**

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