

**Preliminary objections for proposed PPL Richfield-Dalmatia 69kV tie line**

**As per order of David A. Salapa and Joel Cheskis Administrative Law Judges in reference to PPL's application seeking Eminent Domain over portions of the property owned by Elijah and Faye Lahr, Lower Mahanoy Township, Northumberland County, Pennsylvania. A-2011-2267446**

**Initial Prehearing Conference Memoranda of Elijah and Faye Lahr for December 13, 2011**

**I. *Service of documents.***

**We request that all documents be served at this time to:**

**Elijah and Faye Lahr      A-2011-2267446  
679 State Route 147  
Dalmatia, PA 17017  
(570) 758-4694**

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**II. *Settlement***

**A settlement has not been reached with PPL for a right of way over our property nor is any pending at this time.**

- 1. Trespass concerns without answers from PPL**
- 2. Access to the proposed sites has not been presented to us in any way.**
- 3. There has not been any negotiation attempts made with us as stated in PPL's PUC application, not more than a letter sent. The information by PPL is false.**

**III. *Discovery***

**We ask that PPL supply all needed information to us as asked, including questions about procedures and to also include correspondence information, documents and other information which is relevant to discovery. (Discovery questions- attachment A but not limited to) We also ask that the due date for discovery be in June after initial planting season is done. We ask for a future public input hearing this spring so that we may study and gather evidence from experts, the community and also obtain documents and information from PPL for discovery.**

**IV. *Litigation Schedule***

**Elijah and Faye Lahr propose the following schedule;**

|                               |                          |
|-------------------------------|--------------------------|
| <b>Pre-hearing conference</b> | <b>December 13, 2011</b> |
| <b>Discovery questions</b>    | <b>Mid June 2012</b>     |
| <b>Public Input Hearings</b>  | <b>July 31 2012</b>      |
| <b>PUC Hearings</b>           | <b>Fall of 2012</b>      |

***V. Witness list:***

**To include all PPL staff /employees at our discretion who we feel are necessary for clarification of questions and testimony.**

**Questioning to include but not limited to PPL policy, Procedures, Needs, and or PPL RP&P guidelines.**

**Witness list to also include but not limited to everyone on the preliminary hearing service list.**

***VI. Issues and Evidence***

**Issues are listed in the preliminary objections as attachment B as well as Discovery questions attachment A.**

**Evidence to include eyewitness testimony. photographs and documents.**

***VII. Consolidation***

**We do not necessarily support consolidation because of the number of people involved and conflicting work and personal schedules.**

**Certificate of Service**

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of & 1.54 (relating to service by a party)

All served via first class mail.

David B MacGregor  
Post and Schell PC  
Four Penn Center  
1600 John Kennedy Blvd  
Philadelphia PA 19103-2808  
215.587.1197

Shoop Family Trust  
C/O Denny Shoop  
411 Shoop Road  
Dalmatia PA 17017  
A-2011-2267426

Randall Clark  
701 State Route 147  
Dalmatia PA 17017  
A-2011-2267352

Gary & Dorene Lahr  
291 State Route 147  
Dalmatia PA 17017  
A-2011-2267429

John & Evelyn Zeiders  
799 Adams Road  
Dalmatia PA 17017  
A-2011-2267353

Elijah & Faye Lahr  
679 State Route 147  
Dalmatia PA 17017  
A-2011-2267446

Michael Schwalm  
1377 Urban Road  
Herndon PA 17830  
A-2011-2267388

Michael & Logan Wendt  
21 Hoffman Road  
Duncannon PA 17020  
A-2011-2267349

Roy & Cindy Maurer  
469 Malta Road  
Dalmatia PA 17017  
A-2011-2267416

Marvin Roger Hess & Leona Hess  
2078 Old Trail Road  
Liverpool PA 17045  
A-2011-2267448

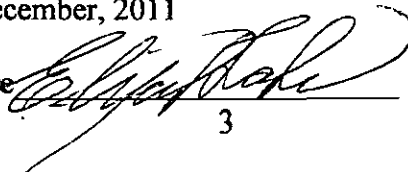
Ronald & Dianne Mace  
584 Malta Road  
Dalmatia PA 17017  
A-2011-2267418

Shoop Family Trust  
C/O Edwin Shoop  
337 Shoop Road  
Dalmatia PA 17017  
A-2011-2267426

Dated this 10 day of December, 2011

Elijah Lahr

Signature



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