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April 17, 2012

VIA OVERNIGHT MAIL

Secretary
Pennsylvania Public Utility Commission
400 North Street
Commonwealth Keystone Building, 2nd Floor
Harrisburg, PA 17120

RECEIVED

APR 17 2012

**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

Re: *Penn Wynn Inc. v. Philadelphia Gas Works;*
In Re: C-2011-2272811; Our File No. 16069.2

Dear Sir/Madam:

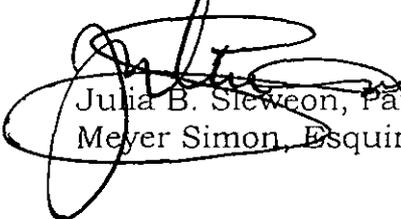
Enclosed herein please find Complainant's Motion for Continuance to be filed of record in the above-referenced matter. Kindly stamp the extra copy and return stamped copy to us in the envelope provided for your convenience.

If you have any questions or need anything further to complete this request, please contact us at the above listed number.

Thank you for your anticipated courtesy and cooperation.

Respectfully,

LAMM RUBENSTONE LLC


Julia B. Slewcon, Paralegal to
Meyer Simon, Esquire

Enclosure

RECEIVED

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION APR 17 2012

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

PENN WYNN INC.

v.

PHILADELPHIA GAS WORKS

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NO. C-2011-2272811

MOTION FOR CONTINUANCE

Penn Wynn Inc., the above-captioned Complainant, by and through its attorney, Meyer Simon, Esquire, hereby moves for a continuance of the hearing scheduled on May 8, 2012, and in support thereof represents:

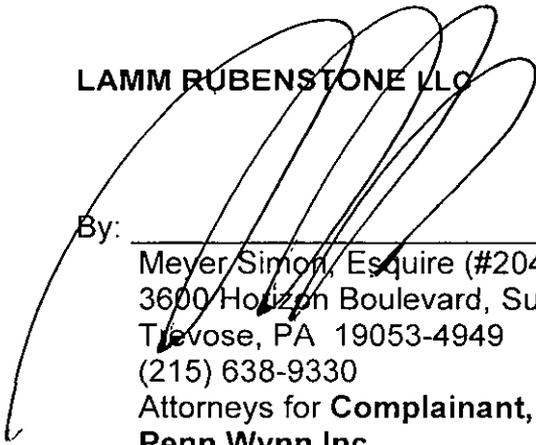
1. Penn Wynn Inc. is the Complainant in the above-captioned proceeding.
2. Philadelphia Gas Works is the Respondent in the above-captioned proceeding.
3. A hearing is scheduled on May 8, 2012, before the Honorable Administrative Law Judge Angela T. Jones.
4. Complainant requests that the hearing scheduled for May 8, 2012, be rescheduled to the first available date convenient to the Complainant and counsel after May 8, 2012, for the following reasons:
 - (1) Counsel for Complainant has been attached for trial before The Honorable Idee Fox beginning on May 8, 2012, at 10:00 a.m. in Courtroom 426, City Hall, Philadelphia, Pennsylvania.
5. As a consequence of the foregoing, there is no other counsel available to otherwise represent the interests of Complainant at the hearing scheduled for May 8, 2012.

6. Opposing counsel objects to Complainant's request for a continuance due to Complainant's failure to make payments due during the pendency of this matter.

7. A short continuance of this matter is reasonable and justifiable under the circumstances and not materially prejudicial to Respondent.

WHEREFORE, it is respectfully requested that the Complainant's Motion for a Continuance be granted.

LAMM RUBENSTONE LLO

By: 

Meyer Simon, Esquire (#20488)
3600 Horizon Boulevard, Suite 150
Trevose, PA 19053-4949
(215) 638-9330
Attorneys for **Complainant,**
Penn Wynn Inc.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENN WYNN INC.

v.

PHILADELPHIA GAS WORKS

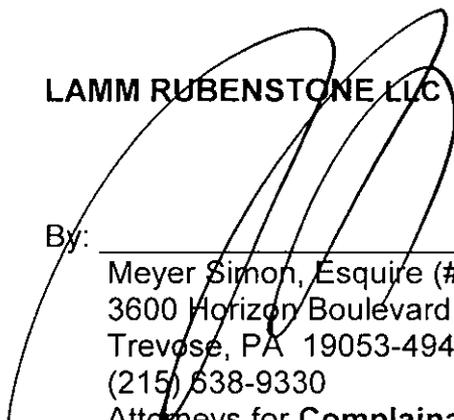
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NO. C-2011-2272811

VERIFICATION

I, Meyer Simon, Esquire, attorney for Complainant, Penn Wynn Inc., state on behalf of Complainant that the facts set forth in the foregoing Motion for Continuance are true and correct to the best of my knowledge, information and belief. I understand that the statements made herein are subject to the penalties of 18 Pa. C.S.A. § 4904, relating to unsworn falsification to authorities.

LAMM RUBENSTONE LLC

By: 

Meyer Simon, Esquire (#20488)
3600 Horizon Boulevard, Suite 150
Trevose, PA 19053-4949
(215) 638-9330
Attorneys for Complainant,
Penn Wynn Inc.

RECEIVED

APR 17 2012

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED

APR 17 2012

PENN WYNN INC.

vi.

PHILADELPHIA GAS WORKS

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

NO. C-2011-2272811

CERTIFICATE OF SERVICE

I hereby certify that on the date listed below I caused to be served a true and correct copy of the foregoing Motion for Continuance by first-class mail, postage prepaid, upon the following:

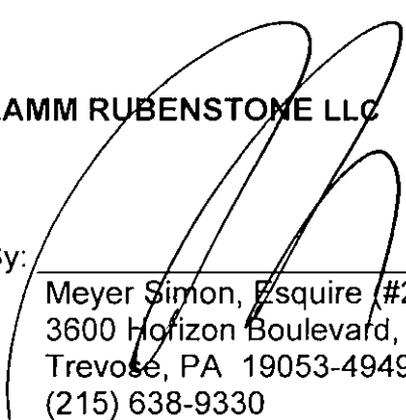
Laureto Farinas, Esquire
Philadelphia Gas Works
800 West Montgomery Avenue
Philadelphia, PA 19122

Pennsylvania Public Utility Commission
801 Market Street, Suite 4063
Philadelphia, PA 19107

Pennsylvania Public Utility Commission
Scheduling Office
P.O. Box 3265
Harrisburg, PA 17105-3265

LAMM RUBENSTONE LLC

By:


Meyer Simon, Esquire (#20488)
3600 Horizon Boulevard, Suite 150
Trevose, PA 19053-4949
(215) 638-9330
Attorneys for Complainant,
Penn Wynn Inc.

DATED: April 16, 2012

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Company Pennsylvania Public Utility Commission

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4a Express Package Service

Packages up to 150 lbs.

- FedEx Priority Overnight
Next business morning * Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- FedEx Standard Overnight
Next business afternoon.* Saturday Delivery NOT available.
- FedEx First Overnight
Earliest next business morning delivery to select locations.* Saturday Delivery NOT available.
- FedEx 2Day
Second business day.* Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- FedEx Express Saver
Third business day.* Saturday Delivery NOT available.

4b Express Freight Service

Packages over 150 lbs.

- FedEx 1Day Freight*
Next business day.* Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- FedEx 2Day Freight
Second business day.* Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- FedEx 3Day Freight
Third business day.* Saturday Delivery NOT available.

5 Packaging

- FedEx Envelope*
- FedEx Pak*
Includes FedEx Small Pak, FedEx Large Pak, and FedEx Sundry Pak.
- FedEx Box
- FedEx Tube
- Other

6 Special Handling

Include FedEx address in Section 3.

- SATURDAY Delivery
Not available for FedEx Standard Overnight, FedEx First Overnight, FedEx Express Saver, or FedEx 3Day Freight.
- HOLD Weekday at FedEx Location
Not available for FedEx First Overnight.
- HOLD Saturday at FedEx Location
Available ONLY for FedEx Overnight and FedEx 2Day to select locations.

Does this shipment contain dangerous goods?

One box must be checked.

- No
- Yes
As per attached Shipper's Declaration
- Yes
Shipper's Declaration not attached
- Dry Ice
Dry Ice, 9 UN 1845 _____ x _____ kg

Dangerous goods (including dry ice) cannot be shipped in FedEx packaging.

Cargo Aircraft Only

7 Payment Bill to:

Enter FedEx Acct. No. or Credit Card No. below.

Obtain Recip. Acct. No.

- Sender Acct. No. in Section 1 will bill:
- Recipient
- Third Party
- Credit Card
- Cash/Check



Total Packages

Total Weight



Credia Card Auth.

Your liability is limited to \$100 unless you declare a higher value. See the current FedEx Service Guide for details.

8 Residential Delivery Signature Options

If you require a signature, check Direct or Indirect.

- No Signature Required
Package may be left without obtaining a signature for delivery.
- Direct Signature
Someone at recipient's address may sign for delivery. Fee applies.
- Indirect Signature
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. Fee applies.

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