

Mary F. Kingcade
5538 Warrington Ave.
Philadelphia PA. 19143

Complainant - PROSE

MARY F. KINGCADE
VS.

PHILADELPHIA GAS WORKS
Attorney Laureto Forinas, ESQ.

COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY
COMMISSION

C-20092134662
C-20102778854

COMPLAINT - Fraudulent Billing
Practice and
Negligence due
to illegal digging
on private property

RECEIVED

APR 19 2012

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

NOTICE TO DEFEND
(Noticia Para EL Acusado)

Cause of Action - Fraud consisting
in willful misrepresentation and deceit con-
cerning defendants billing practices and wrongful
conduct relative to illegal digging, placing pipes
and the negligent act of damaging under
ground gas piping on private property.
All of which has caused emotional distress.

Liability for Fraudulent Misrepresentation

One who fraudulently makes a misrepresentation of facts, opinion, intention or law for the purpose of inducing another to act or to refrain from action in reliance upon it is subject to liability to the other for pecuniary loss caused to him by his justifiable reliance upon the misrepresentation.

One by outrageous conduct - Recklessly caused severe emotional distress to another is subject to liability for such emotional distress.

VERIFICATION

Complainant Mary F. Kingrade
Verify that the facts and statements
set forth in this complaint are true
and correct to the best ^{of} her knowledge,
information and belief. The complainant
understands that statements in
this complaint are subject to the
criminal penalties of 18 Pa. C.S. § 4904
relating to unsworn falsification
to authorities.

August 04, 2011

Mary F. Kingrade
Mary F. Kingrade, PA

CERTIFICATE OF SERVICE

I hereby certify that I have served
a true copy of this complaint with
A Cause of Action on this day
upon the participant listed.

For Defendant:

Laureto Farinas, Esq.
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122
(215 684-6982)

August 04, 2011

Mary F. Kingcade-Rose
Mary F. Kingcade
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267-670 3845