

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

STEVE ATUAHENE ;

v. ; C-2012-2299868

PECO ENERGY COMPANY ;

RECEIVED
2012 JUN 25 AM 10:43
P. U. C.
SECRETARY'S BUREAU

APPLICATION FOR A CONTINUANCE OF SCHEDULE HEARING
FOR JULY 2, 2012.

Complainant Pro Se STEVE ATUAHENE hereby respectfully request this commission to continue the scheduled hearing of July 2, 2012 due to circumstances beyond his control and in support thereof states as follows:

1. The Commission has scheduled instant case for July 2, 2012.

2. The scheduled date is in conflict with mayor jury trial at Court of Common Pleas of Philadelphia County. EXHIBIT A1

3. The case is Incompone v. Redevelopment Authority of the City of Philadelphia February Term 2011 No. 01666 in the Court of Common Pleas of Philadelphia County. EXHIBIT A2

4. This is an Eminent Domain case whereby the Redevelopment Authority of the City of Philadelphia condemned our property in November 15, 2006 under the caption Redevelopment Authority of the City of Philadelphia v. Agnes Frempong November Term 2006 No. 01249 EXHIBIT B.

5. The November Term 2006 case came before the Board of View of Philadelphia County in 2010 and we appeal the case to the Court of Common Pleas of Philadelphia and it was given a new caption since it is a de novo trial.

6. The new caption is: Frempong v. Redevelopment Authority February Term 2011 No. 01666.

7. Redevelopment Authority has refused to pay just compensation under the 5th Amendment of the U.S. Constitution to the detriment of the Frempong.

8. Therefore it's critical that we do not continue that case and request that that case be continued for thirty days.

WHEREFORE, the complainant respectfully request that the scheduled hearing on July 2, 2012 which conflicts with the case at Court of Common Pleas of Philadelphia County scheduled for trial be continued for thirty (30) days.

RESPECTFULLY SUBMITTED

SR
STEVE ATUAHENE
AKA STEVE FREMPONG



**IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
TRIAL DIVISION - CIVIL**

FREMPONG

February Term 2011

VS

No. 01666

REDEVELOPMENT AUTHORITY OF THE CITY OF

PRETRIAL ORDER

The above matter was conferenced pursuant to Pennsylvania Rule of Civil Procedure 212.

Trial of this matter is scheduled:

- As a pool case during the month of July, 2012. Subject to call for trial upon next day notice.
- For a date certain on N/A 2012. Jury selection to commence on _____, 2012.
- A Mandatory Settlement Conference is scheduled for N/A, 2012 at _____ M. in Courtroom 682 City Hall.

Counsel have stipulated that this case shall be tried before a jury of 12 persons. Two alternates shall be selected.

All counsel of record are hereby attached.

At trial Plaintiff's witnesses shall be limited to those individuals identified by name and address on the party's Pretrial Memorandum.

Defendant's witnesses shall be limited to those individuals identified by name and address on the party's Pretrial Memorandum.

Except for good cause shown, the parties will be precluded from offering substantive evidence through any person not so listed. The listing of a witness does not commit the listing party to have such person available at trial or to offer the testimony of such person. Any party may offer the testimony of a witness listed by any other party.

The parties shall be limited in direct examination to the use of only those exhibits listed in their Pretrial Memorandum. Except for good cause shown, the parties will be precluded from offering in evidence, using as demonstrative evidence or using in interrogating any of their witnesses any exhibit not so identified. The listing of an exhibit does not commit the party to use it.

All Motions in Limine shall be filed not later than 20 days prior to the start of trial. Responding counsel shall have 10 days thereafter to file any response. If a pool case, the start of the trial is defined as the first day of the trial pool.

Proposed Voir Dire, Points for Charge and Special Interrogatories shall be provided to opposing counsel and the Court 5 days prior to date certain trials or 5 days prior to the pool month.

EXHIBIT A:

BY THE COURT:

MARLENE LACHMAN, J.

AGNES FREMPONG
Plaintiff

: COURT OF COMMON PLEAS
OF PHILADELPHIA COUNTY

v.

: FEBRUARY TERM 2011

REDEVELOPMENT AUTHORITY
OF THE CITY OF PHILADELPHIA
Defendant

: NO. 01666

TO THE PROTHONOTARY

PRAECIPE FOR JURY TRIAL

Plaintiff respectfully request jury
trial in aforementioned Eminent Domain case.

RESPECTFULLY SUBMITTED

Agnes Frempong
AGNES FREMPONG

7000 WOODBINE AVENUE
PHILADELPHIA PA 19151
215 473 8049

247.94

VALIDATION
DATE: 01/13/12 TIME: 11:00
TICKET NO: 54184
CASE NO: 110201666
TOTAL AMT: \$ 247.94
REGISTER: Register 3 282 CNJ
CASHIER: RJB
CUSTOMER: Cash walk-in customer

C.T.M.J.

Frempong Vs Redevelopment Authority Of The C-JURYT



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FILE FOR...

EXHIBIT
"A"
N

PHILADELPHIA COURT OF COMMON PLEAS
PETITION/MOTION COVER SHEET

CONTROL NUMBER:

045140

(RESPONDING PARTIES MUST INCLUDE THIS NUMBER ON ALL FILINGS)

FOR COURT RESPONSE DATE	
ASSIGNED TO JUDGE:	ANSWER/RESPONSE DATE: MAY 07 2012
Do not send Judge courtesy copy of CIVIL ADMINISTRATION Status may be obtained online at http://courts.phila.gov	

NOVEMBER Term, 2006
Month Year
No. 01249

Name of Filing Party:

AGNES FREMPONG
(Check one) Plaintiff Defendant
(Check one) Movant Respondent

REDEVELOPMENT AUTHORITY OF CITY OF PHILA
AGNES vs. FREMPONG

INDICATE NATURE OF DOCUMENT FILED:

Petition (Attach Rule to Show Cause) Motion
 Answer to Petition Response to Motion

Has another petition/motion been decided in this case? Yes No
Is another petition/motion pending? Yes No
If the answer to either question is yes, you must identify the judge(s):

TYPE OF PETITION/MOTION (see list on reverse side) <u>DAMAGES FROM THE PROTHONOTARY PURSUANT TO §§ 407, 521 AND 522 OF EMINENT DOMAIN ACT</u>	PETITION/MOTION CODE (see list on reverse side) <u>MTREF</u>
ANSWER/RESPONSE TO	

I. CASE PROGRAM

Is this case in the (answer all questions):

A. COMMERCE PROGRAM

Name of Judicial Team Leader: _____
Applicable Petition/Motion Deadline: _____
Has deadline been previously extended by the Court?
 Yes No

B. DAY FORWARD/MAJOR JURY PROGRAM — Year _____

Name of Judicial Team Leader: _____
Applicable Petition/Motion Deadline: _____
Has deadline been previously extended by the Court?
 Yes No

C. NON JURY PROGRAM

Date Listed: _____

D. ARBITRATION PROGRAM

Arbitration Date: _____

E. ARBITRATION APPEAL PROGRAM

Date Listed: _____

F. OTHER PROGRAM

Date Listed: _____

OTHER

II. PARTIES

(Name, address and telephone number of all counsel of record and unrepresented parties. Attach a stamped addressed envelope for each attorney of record and unrepresented party.)

JANE M. DUFFY ESQ
REDEVELOPMENT AUTHORITY
OF CITY OF PHILA
1234 MARKET STREET
16TH FLOOR
PHILA PA 19107

In Re. Redevelopment Authority Of The City O-MTREF



06110124900058

By filing this document and signing below, the moving party certifies that this motion, petition, answer or response along with all documents filed, served upon all counsel and unrepresented parties as required by rules of Court (see PA. R.C.P. 206.6, Note to 208.2(a), and 440). Furthermore, the party verifies that the answers made herein are true and correct and understands that sanctions may be imposed for inaccurate or incomplete answers.

Agnes Frempong 4/17/12 AGNES FREMPONG
Attorney Signature/Unrepresented Party (Date) (Print Name) (Attorney I.D. No.)

This Petition, Motion and Answer or Response, if any, will be forwarded to the Court after the Answer/Response Date. Extension of the Answer/Response Date will be granted even if the parties so stipulate.

EXHIBIT "B"

CERTIFICATE OF SERVICE

I, STEVE ATUATENE aka STEVE FREMPONG hereby certify that a true and correct copy of the foregoing Application for Continuance and accompanying papers, was served on below listed ~~ed~~ names and addresses by first-class U.S. mail, postage prepaid and/or hand delivery on 6/22/12.

1. Administrative Law Judge Eranda Vero
Suite 4063
801 Market Street
Phila PA 19107

Shawane L. Lee Esq
Exelon Business Services
2301 Market St, S 23.1
Phila PA 19101

DATE: 6/22/12

SR

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SECRETARY'S BUREAU

STEVE ATUAHENE
7000 Woodbine Ave
Phila PA 19151



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SECRETARY
Pennsylvania

Public Utility Commission

P. O. Box 3265

HARRISBURG PA 17105-3265