



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE
REFER TO OUR FILE
C-2011-2235323

December 21, 2012

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: **Pennsylvania Public Utility Commission Bureau of Investigation
and Enforcement v. Reginald W. Piatt; C-2012-2301061**

Dear Secretary Chiavetta:

Enclosed for filing is an original copy of a Motion for Continuance of the Bureau of Investigation and Enforcement in the above-referenced case. Copies have been served on the parties of record in accordance with the Certificate of Service.

Sincerely,

Heidi L. Wushinske, Esq.
Prosecutor

Enclosure

cc: As per certificate of service

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :
Bureau of Transportation and Safety :
: C-2012-2301061
v. :
: :
Reginald W. Piatt :

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MOTION FOR CONTINUANCE
OF THE BUREAU OF INVESTIGATION AND ENFORCEMENT

AND NOW comes the Bureau of Investigation and Enforcement (I&E) of the Pennsylvania Public Utility Commission (Commission), by and through its attorney, Heidi L. Wushinske, and files this Motion for Continuance of the Initial Hearing in accordance with Section 1.15(b) of the Commission's regulations, 52 Pa. Code §1.15(b).

In support thereof, I&E states as follows:

1. The above-captioned Formal Complaint is scheduled for an Initial Hearing before Administrative Law Judge (ALJ) Susan D. Colwell on January 3, 2013, at 10:00 a.m. in Harrisburg, Pennsylvania.
2. On November 27, 2012, ALJ Colwell issued a Prehearing Order, which directed the parties to speak regarding settlement of this case.
3. The parties have been engaged in discussions for the past three weeks.
4. I&E has requested and received additional documentation from Complainant's insurer.

5. After reviewing this information, I&E believes that withdrawal of this case is warranted and sent notification of withdrawal to Respondent on December 21, 2012.
6. I&E requests a continuance of at least thirty days to comply with the objection period regarding withdrawals. 52 Pa. Code § 5.94.
7. This is the first extension sought by Complainant in this matter and is unopposed and supported by the Respondent.

WHEREFORE, the Bureau of Investigation and Enforcement requests that the hearing in this matter be briefly continued due to the withdrawal of this Complaint.

Respectfully Submitted,



Heidi L. Wushinske
Attorney ID # 93792

P.O. Box 3265
Harrisburg, PA 17105-3265
Phone: 717-214-9594
Fax: 717-783-3458
Email: hwushinske@pa.gov

Dated: December 21, 2012

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document, Motion for Continuance, upon the parties, listed below, in accordance with the requirements of 52 Pa.Code § 1.54 (relating to service by a party).

Service by First Class Mail:

The Honorable Susan D. Colwell
Administrative Law Judge
Pennsylvania Public Utility Commission
Office of Administrative Law Judge
P.O. Box 3265
Harrisburg, PA 17105-3265

REGINALD PIATT
2220 STATE ROUTE 17
ELMIRA NY 14901



Heidi L. Wushinske
Prosecutor
Attorney ID # 93792

Counsel for the Bureau of
Investigation and Enforcement of
the Pennsylvania Public Utility
Commission

P.O. Box 3265
Harrisburg, PA 17105-3265
Phone: 717-772-8839

Dated: December 21, 2012

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