

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

1305 WALNUT STREET CORP.	:	
d/b/a HOLIDAY INN EXPRESS	:	
Complainant	:	
	:	
v.	:	C-2012-2337290
	:	
PHILADELPHIA GAS WORKS	:	
Respondent	:	

MOTION FOR CONTINUANCE OF HEARING

Pursuant to 52 Pa. Code § 1.15(b), 1305 Walnut Street Corp. d/b/a Holiday Inn Express (hereinafter “Complainant”), through counsel, hereby moves for a continuance of the hearing in this matter scheduled for March 21, 2013, and in support states as follows:

1. On or about November 26, 2012, Complainant filed a Formal Complaint against the Philadelphia Gas Works (hereinafter, “Respondent”).
2. An Initial Hearing was scheduled for Thursday, March 21, 2013.
3. The undersigned Complainant’s counsel is unavailable on March 21, 2013, due to a prior commitment to offer a speaking presentation in Halifax, Nova Scotia, Canada on that date. Counsel is contractually bound to appear at that speaking engagement, and has purchased non-refundable airfare to Halifax.
4. On February 8, 2013, the undersigned counsel contacted Respondent’s counsel to advise him of the need for a continuance. Respondent’s counsel stated that Respondent does not object to a continuance.

WHEREFORE, Complainant moves that the March 21, 2013 Initial Hearing be continued to another date mutually agreeable to the Commission and the parties.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'J. Grimes', is written above a horizontal line.

Joshua L. Grimes, Esquire
Counsel for Complainant
Grimes Law Offices, LLC
123 South Broad Street, 28th Floor
Philadelphia, PA 19109
215-772-5070

Dated: February 14, 2013