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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Odesa McCastle

v.

Docket No. F-2013-2345223

Philadelphia Gas Works

Odesa McCastle Response to the Preliminary Objections and Motion to Strike

Per 52 Pa. Code 5.101, and the related case law for the Commonwealth of Pennsylvania, Odesa Castle, responds as follow:

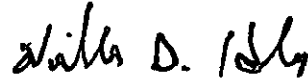
1. Admit.
- 2 Admit, by way of further response Complainant did properly register the property located at 139 N. 50<sup>th</sup> Street, Philadelphia, PA. and was in fact and law protected under the Landlord Cooperation Program.
3. Admit , see above response., By way of further response Odesa Castle was never placed on Legal Notice of the Lien on the Subject Property, and was forced to pay this Lien in order to complete the Closing and sale of the Property.
- 4 Admit in part, Deny in Part .See Response TO 2 AND 3. Odesa McCastle was afforded the protection by PGW, and the City of Philadelphia, the owner of PGW, under the Landlord Protection program. City of Philadelphia, owner of PGS, had no legal or equitable Right to File the defective lien, but having done so did cause the financial loss to the Complainant.
5. Admit and she claims relief for Legal fees and Interest.

6. Deny. This is a Valid Cause of Action before this Honorable Commission. This is a Valid cause of action and Complainant is entitled to the relief now sought from PGW.
7. Admit.
8. Admit
9. Denied. As to the facts before the commission and that the Complainant was afforded the protection under the Landlord Cooperation Program. Case law cited by PGW does not apply to this matter.
10. Denied as the unique factual and legal contested issues before the Commission.
11. Not applicable as the factual and legal issues before the Commission. Denied as to this appeal.
12. Denied as to the legal and factual contested issues before the Commission.
13. Denied. The Commission has jurisdiction over this Appeal.
14. Denied. The Commission has jurisdiction over this Appeal. Relief now sought is within the power and jurisdiction of the Commission.

WHEREFORE, Odesa McCastle, respectfully requests that the Commission deny with full Prejudice the preliminary objections of PGW and that this matter proceed to the Hearing as so Required by statute.

March 1, 2013

Respectfully submitted

Handwritten signature of William D. Hobson in black ink, written in a cursive style.

William D. Hobson, Esq.

Atty.# 34574

Counsel for Odesa McCastle

2 Penn Center, Suite 1410 , 15<sup>th</sup> JFK

Philadelphia, PA. 19122

VERIFICATION

I, William D. Hobson, Esq., verify that the statements set forth in the Complainant's Response to the Preliminary Objections and Motion to Strike file by PGW are true and correct, to the best of my information, belief and knowledge. This verification is made subject to penalties under 18 Pa. C.A., Section 4904, relating to unsworn falsification to authorities.

*William D. Hobson*

WILLIAM D. HOBSON

*William D. Hobson*

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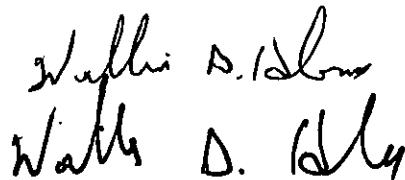
CERTIFICATE OF SERVICE

I, William D. Hobson, Esquire do hereby certify that I have served a True and Correct copy of the foregoing document upon the participants listed below :

Laurento Farinas, Esq., Counsel for PGW.

800 W. Montgomery Avenue

Philadelphia, PA 19122



William D. Hobson, Esq., P.C.

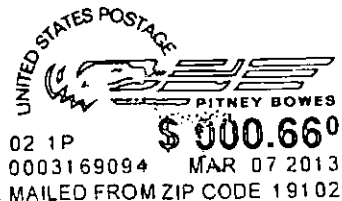
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Philadelphia, PA. 19102

Date:  
March 1, 2013

**MyPhillyLawyer.**

Silvers, Langsam & Weitzman, PC  
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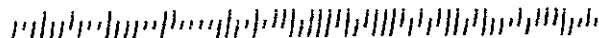
ROSEMARY CHIANETTA, SECRETARY,

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