

**September 19, 2013**

**Via Electronic Filing**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street-Second Floor  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Docket #2013-2371560**

**LIDIA SHAN**  
**V**  
**VERIZON PENNSYLVANIA, INC**

**MOTION TO DISMISS VERIZON'S ANSWER OF  
SEPTEMBER 17, 2013 TO RELEASE NEEDED  
DOCUMENTATION FOR THE HEARING**

**CERTIFICATE OF SERVICE.**

Dear Ms. Chiavetta,

Attached for filing is my **Motion to Dismiss Verizon's Answer of September 17 TO Release Needed Documentation for the Hearing scheduled on September 27, 2013** with the Commission in connection with complaint Docket #2013-2371560.

My "Motion" will be served to your office and the opponent at the same time as required by the Commission's Regulations by the date above. This is to verify that I E-filed my "Petition" and Certificate of Service to your attention and to the opponent.

Thank you very much for your attention into the above matter.

Respectfully,

Lidia Shan,  
301 Byberry Rd, Apt. #F-14,  
Philadelphia, PA 19116  
215-677-6471  
[smellsense@aol.com](mailto:smellsense@aol.com)

cc: Steven K. Haas,  
Counsel for Verizon Pennsylvania Inc.  
Hawke McKeon & Sniscak, LLP  
100 North Tenth Street,  
Harrisburg, PA 17105-1778

**VIA E-FILING**

**September 19, 2013**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Docket #2013-2371560**

**Lidia Shan**

**v**

**Verizon Pennsylvania, Inc.**

**MOTION TO DISMISS VERIZON'S ANSWER OF  
SEPTEMBER 17, 2013 TO RELEASE NEEDED  
DOCUMENTATION FOR THE HEARING**

On September 17, I received a statement from Verizon, PA that the requested previously documents are non-existent documents. Refusing to provide these documents under false pretence constitutes obstruction of justice. Therefore I Motion to dismiss Verizon's "Answer" as it is misleading and inaccurate. Verizon is intentionally concealing necessary documentation from hearing that supposed to take place on September 27, 2013.

According to my discovery on September 18, 2013 in the conversation with Verizon's representative who identified that the documents are in existence in Verizon's system. There are notes attached to my account in Verizon's system as of September 18, 2013 where there is a statement that the conversation took place on November 21, 2011 and it was issued fee of \$6.0 for suspended line. I requested to release records of the conversation of November 21, 2011 regarding suspension of services for my telephone. I believe that the denial of existence of records that correlate to the confirmation number is a lie. Verizon's "Objections" and "Answer" reveals openly these lies in officially responding to my requests.

Verizon perfectly understood what I was requesting from them and that was to identify the confirmation numbers I received from Verizon and correlate with the content of the conversation on particular dates and yet Verizon goes to the extent to lie.

I insist that ALJ subpoena Verizon to provide the following documentation:

1. Operational procedure to disconnect the dial tone line
2. Operational procedure to suspend the dial tone line
3. Operational procedure to issue a confirmation number
4. Records, notes of conversation between Verizon representative and me on November 21, 2011
5. Records, notes of conversation between Verizon representative and me on November 2, 2010
6. Confirmation numbers PA 00128314172 of 21/11/2011 and what it is concerns
7. Confirmation number PA00077679813 of 2/11/2010 and what it is concerns
8. Where these confirmation numbers are being logged and stored?
9. What is the value of the confirmation number?

10. What is the validity of confirmation number?
11. How long the confirmation numbers must be kept for references?
12. Is there an established tracking system to reference the confirmation numbers?
13. Who reads and has access to oversee the confirmation numbers?
14. How these confirmation numbers are being coordinated with billing department and correlated to the account of the consumer?

By concealing the above mentioned documentation Verizon will be liable in postponement of the court hearing as the hearing cannot take place without these documents presented in court to me and the assigned ALJ. Verizon is intentionally blocking the fair justice to take place. It is expected that the position of ALJ in this hearing must be impartial. Verizon is liable for intentionally discredit my financial integrity by falsifying evidence of my delinquency filing with collection agencies.

Respectfully,

Lidia Shan