

September 26, 2013

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street — Filing Room (2nd Floor)
P.O. Box 3265
Harrisburg, PA 17105-3265

CERTIFICATE OF SERVICE

RE: Lidia Shan
v
Verizon Pennsylvania;

Docket No. C-2013-2371560;

**MOTION TO VACATE OR SET ASIDE JUDGMENT OF THE
DOCKET # 2009-2150021**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is my Motion to vacate judgment of the docket #2009-2150021. I Motion to set aside judgment because the statute applied to the judgment was vague. I was dissatisfied with the end result in the case. A copy of this document will be served to your office and the respondent at the same time as required by the Commission's Regulations by the date above. This is to verify that I E-filed my Motion to vacate judgment in the docket #2009-2150021 and Certificate of Service to your attention and to the respondent. If you have any questions with regard to this filing, please direct them to me. Thank you for your attention to this matter.

Sincerely,

Lidia Shan
215-758-0280

cc: Steven K. Haas,
Counsel for Verizon Pennsylvania Inc.
Hawke McKeon & Sniscak, LLP
100 North Tenth Street,
Harrisburg, PA 17101

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**BEFORE THE PENNSYLVANIA
PUBLIC UTILITY COMMISSION**

LIDIA SHAN,
Complainant

Docket No. C-2013-2371560

v

VERIZON PENNSYLVANIA LLC,
Respondent.

**MOTION TO VACATE JUDGMENT OF THE
DOCKET # 2009-2150021**

I Motion to vacate judgment of July 16, 2013 of the docket #2009-2150021 due to no actions being taken to resolve the case, violations in the court proceedings, and ALJ intentional misconduct.

My open statements to Chairman Powelson of July 29, 2013 and August 15, 2013 were not given the proper attention as I requested in those documents to revoke the judgment.

Therefore I Motion to vacate the judgment of July 16, 2013 as I did not receive satisfaction in the end results of the case and no resolution.

As I stated in my correspondences that abuse of a power and deceit by ALJ took place in the court of law. ALJ' misconduct in her intentional omission of evidences makes this judgment in the case be vacated.

ALJ acted inappropriately and in unfair manner. I pointed out to Chairman Powelson in my correspondences all the discrepancies that took place before the hearing, during the hearing, after the hearing in regard to the ALJ misconduct and conspiracy with Verizon that influenced the end results in my case; however PPUC did not respond to my request.

The statute applied to this judgment was vague; there were many discrepancies in the proceedings of docket #2009=2150021 as I stated in my letters to Chairman Powelson.

Therefore I Motion to vacate this judgment based on the following:

1. I.D. signed by ALJ be vacated on the grounds of intentionally misleading conduct;
2. Verizon, by concealing factual evidences that suspended line is a disconnected line because they switch off the circuit and the line cannot have a signal; they committed obstruction of justice and fraud;
3. Verizon, by not providing crucial evidence of the actual costs for suspended telephone lines basically proved that the approved tariffs are unreasonable and unjustifiable;

4. Order of August 2012 be vacated since I never received the judgment; evidences and facts were intentionally concealed; order has neither validity nor proof that it was justifiable;
5. Judgment of July 2013 be vacated due to intentional omission of the subject matter;
6. New hearing be scheduled with an impartial adjudicator.

Bias ALJ's decision who knowingly misused her power cited with Verizon's interests by intentionally omitting the evidences of my complaint, my open statement in court and the testimony of Verizon's witness Ms. Ryan to be considered, signing I.D. without justice constitutes intentional misconduct. Due to this misconduct the judgment must be vacated immediately.

In my open statement to Chairman Powelson of PPUC I wrote:

"Chairman Powelson, I request Verizon's I.D. of 2012, signed by ALJ, and Orders of August 30, 2012 and July 16, 2013 in the case #2009-2150021 be annulled immediately for knowingly misleading conduct and obstructing justice."

I presented 23 facts in my arguments and correspondences that were intentionally omitted from the decision. Initial Decision signed by ALJ did not reflect on the facts: letter of January 2010, my statement in hearing, testimony of Ms. Ryan; Verizon's unwillingness to provide the factual evidence of costs related to suspended phone lines to prove that the approved tariffs they are using were substantiated and reasonable. I.D. written by Verizon is a forgery, unlawful and misleading; the content doesn't disclose the facts. Therefore, I.D. must be vacated as of no evidence; it presents a serious offence of justice.

"I did not receive a legitimate hearing because all my evidences were thrown out conveniently to suit Verizon. Verizon, by not providing the factual costs for suspended phone line as a crucial evidence to justify the tariffs in question in actuality concealed intentionally this evidence from the judge and me; Verizon obstructed justice."

ALJ did not rule against Verizon when Verizon was not complying with the request; they disobeyed the request in hearing and repeated request in the letter of January 2010 by not providing the costs to substantiate the questionable tariffs. What did ALJ do in this case? She never wrote a final decree describing this fact and never presented as fact in her I.D.

These are the reasons to vacate the judgment of July 16, 2013.

Lidia Shan