

LARRY R. CRAYNE, PC
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(412) 831-5462
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June 2, 2014

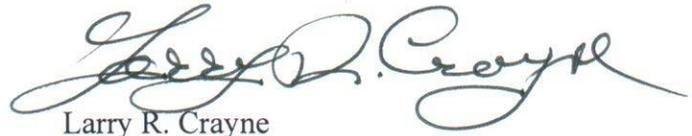
Hon. Mary D. Long
301 Fifth Avenue
Suite 220, Piatt Place
Pittsburgh, PA 15222

Re: John Ombres v. Columbia Gas of Pennsylvania
Complaint Docket No. C-2013-2393183

Dear Judge Long:

Enclosed please find a Motion for Sanctions in the above-captioned complaint. A copy of the Motion is being served on Complainant's attorney electronically and by first class mail.

Sincerely,



Larry R. Crayne

cc: Robert J Taylor, Esq.
337 Merchant Street
Ambridge, PA 15003

Commonwealth of Pennsylvania

Before the Pennsylvania Public Utility Commission

In the Matter of:

John Ombres,
Complainants,

Complaint Docket
No. C-2013-2393183

VS.

Columbia Gas of Pennsylvania, Inc.,
Respondent.

Motion for Sanctions

AND NOW comes Respondent, Columbia Gas of Pennsylvania, Inc. (Columbia Gas), pursuant to 52 *Pa. Code*, Section 5.371 and 5.372, and files the following Motion for Sanctions:

1. On May 5, 2014, Respondent in this proceeding served interrogatories on Complainant's attorney. A copy of the Interrogatories and the Certificate of Service is attached hereto as Exhibit A.

2. The Interrogatories relate to proposed expert testimony to be presented on behalf of Complainant at the scheduled June 17, 2014 hearing of this Complaint.

3. As of the date of this Motion, Complainant and his attorney have failed to file objections to the interrogatories or to otherwise respond to the discovery requests.

4. An initial In Person Hearing in this Complaint is scheduled for Tuesday, June 17, 2014 beginning at 10:00 a.m.

Wherefore, Columbia Gas moves that Complainant be prohibited at the hearing of this Complaint from introducing into evidence any documents or testimony by an expert or experts related to the safety of the Complainant's dual natural gas service.

Respectfully submitted,

Columbia Gas of Pennsylvania, Inc.

By: 
Larry R. Crayne, Esq.

LARRY R. CRAYNE, PC
Attorney at Law

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Pittsburgh, PA 15241

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May 5, 2014

Robert J. Taylor, Esq.
337 Merchant Street
Ambridge, PA 15003

Re: John Ombres v. Columbia Gas of Pennsylvania, Inc.
Complaint Docket No. C-2013-2393183

Dear Mr. Taylor:

I have enclosed Interrogatories to be answered by Mr. Ombres in accordance with the discovery rules of the Commission. Please provide timely answers to the interrogatories in order that Columbia Gas may evaluate Mr. Ombres' position regarding the safety of the dual service to Mr. Ombres. A copy of 52 *Pa. Code*, Sections 5.321, 5.341 and 5.342 is enclosed for your convenience.

Sincerely,



Larry R. Crayne

Exhibit A

3. Please state the substance of the testimony of each witness Complainant expects to testify for Complainant at the hearing of this proceeding, including the conclusions to be drawn from the testimony.

Respectfully submitted,

Columbia Gas of Pennsylvania, Inc.

By: 
Larry R. Crayne, Esq.

LARRY R. CRAYNE, PC
Attorney at Law

238 Johnston Road
Pittsburgh, PA 15241

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(412) 831-5462
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May 5, 2014

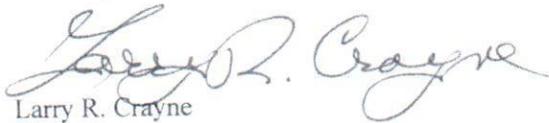
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

**Re: John Ombres v. Columbia Gas of Pennsylvania, Inc.
Complaint Docket No. C-2013-2393183**

Dear Ms. Chiavetta:

Enclosed please find an original and three copies of a Certificate of Service of Interrogatories on the Complainant in the above-captioned proceeding.

Sincerely,


Larry R. Crayne

cc: Robert J Taylor, Esq.
337 Merchant Street
Ambridge, PA 15003

Commonwealth of Pennsylvania
Before the Pennsylvania Public Utility Commission

In the Matter of:

John Ombres,
Complainant,

Complaint Docket
No. C-2013-2393183

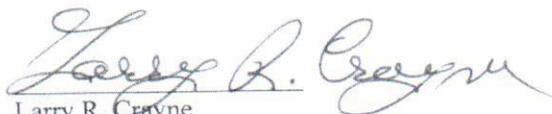
VS.

Columbia Gas of Pennsylvania, Inc.,
Respondent.

Certificate of Service

I hereby certify that I have this day served Interrogatories on Complainant in the above-captioned proceeding.

Dated this 5th day of May, 2014



Larry R. Crayne
238 Johnston Road
Pittsburgh, PA 15241

Counsel for
Columbia Gas of Pennsylvania, Inc.

Certificate of Service

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the participant, listed below, in accordance with the requirements of Sec. 1.54 (relating to service by a participant).

Robert J. Taylor, Esq.
337 Merchant Street
Ambridge, PA 15003

Dated this 2nd day of JUNE, 2014


Larry R. Crayne
238 Johnston Road
Pittsburgh, PA 15241

Counsel for
Columbia Gas of Pennsylvania, Inc.