

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ASHLEY HARPLE

v.

PENNSYLVANIA ELECTRIC COMPANY

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Docket No. C-2014-2434701

**REPLY TO NEW MATTER**

And now comes the Complainant, Ashley Harple, by her attorney, James Ehrman, Esquire, and files the within Reply to New Matter filed against her as follows:

11. The Complainant states that after a reasonable investigation, she is without sufficient information to ascertain the truth or falsity of said averments; wherefore the Complainant denies said averments asking for proof thereof at the time of the hearing.

12. The Complainant states that after a reasonable investigation, she is without sufficient information to ascertain the truth or falsity of said averments; wherefore the Complainant denies said averments asking for proof thereof at the time of the hearing.

13. The Complainant states that after a reasonable investigation, she is without sufficient information to ascertain the truth or falsity of said averments; wherefore the Complainant denies said averments asking for proof thereof at the time of the hearing.

14. The Complainant states that after a reasonable investigation, she is without sufficient information to ascertain the truth or falsity of said averments; wherefore the Complainant denies said averments asking for proof thereof at the time of the hearing.

15. The Complainant states that after a reasonable investigation, she is without sufficient information to ascertain the truth or falsity of said averments; wherefore the Complainant denies said averments asking for proof thereof at the time of the hearing.

16. The Complainant states that after a reasonable investigation, she is without sufficient information to ascertain the truth or falsity of said averments; wherefore the Complainant denies said averments asking for proof thereof at the time of the hearing.

17. The Complainant states that after a reasonable investigation, she is without sufficient information to ascertain the truth or falsity of said averments; wherefore the Complainant denies said averments asking for proof thereof at the time of the hearing.

18. The Complainant states that after a reasonable investigation, she is without sufficient information to ascertain the truth or falsity of said averments; wherefore the Complainant denies said averments asking for proof thereof at the time of the hearing.

19. The Complainant states that after a reasonable investigation, she is without sufficient information to ascertain the truth or falsity of said averments; wherefore the Complainant denies said averments asking for proof thereof at the time of the hearing.

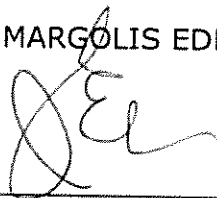
20. The Complainant states that after a reasonable investigation, she is without sufficient information to ascertain the truth or falsity of said averments; wherefore the Complainant denies said averments asking for proof thereof at the time of the hearing.

21. The Complainant states that after a reasonable investigation, she is without sufficient information to ascertain the truth or falsity of said averments; wherefore the Complainant denies said averments asking for proof thereof at the time of the hearing.

22. The Complainant states that after a reasonable investigation, she is without sufficient information to ascertain the truth or falsity of said averments; wherefore the Complainant denies said averments asking for proof thereof at the time of the hearing.

WHEREFORE, Complainant Ashley Harple denies that she is liable to Pennsylvania Electric in any sum or sums whatsoever.

MARGOLIS EDELSTEIN



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JAMES S. EHRMAN, ESQUIRE  
Counsel for Ashley Harple

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing **REPLY TO NEW MATTER** was served upon all counsel of record by U.S. Mail, postage prepaid, this \_\_\_\_ day of September, 2014 as follows:

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

JAMES S. EHRMAN, ESQUIRE  
525 William Penn Place, Suite 3300  
Pittsburgh, PA 15219  
(412) 281-4256

**VERIFICATION**

I, Ashley Harple, verify that the statements of fact contained in the foregoing REPLY TO NEW MATTER are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A. § 4904, relating to unsworn falsification to authorities.

  
\_\_\_\_\_  
Ashley Harple

Dated: 9/3/14