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January 26, 2015

Our File No.: 99999.2-00078

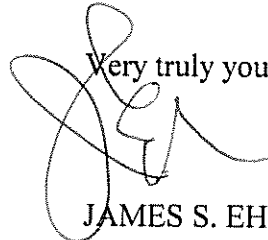
Mark A. Hoyer, Administrative Law Judge
Piatt Place, Suite 220
301 5th Avenue
Pittsburgh, PA 15222

Re: Ashley Harple v. Pennsylvania Electric Company
Docket No. C-2014-2434701

Dear Judge Hoyer:

Enclosed please find a Motion to Strike Certificate of Satisfaction on behalf of my client, Ashley Harple..

Your cooperation is appreciated and I am available to address any issues for the court.

Very truly yours,

JAMES S. EHRMAN

JSE:is

Enclosure

cc: Margaret A. Marris - via e-mail (w/encl)
Sarah Stoner, Esquire - via e-mail (w/encl)
Ashley Harple (w/encl)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ASHLEY HARPLE

v.

PENNSYLVANIA ELECTRIC COMPANY

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Docket No. C-2014-2434701

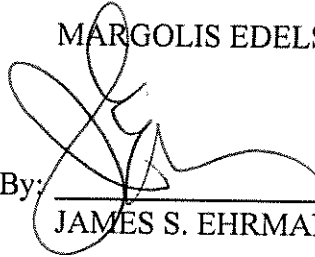
NOTICE

KINDLY TAKE NOTICE that the within Motion to Strike is being presented to the Honorable Judge Mark Hoyer, Administrative Law Judge, with the filing of the within Motion asking the Court for an opportunity to be heard on the contents of the Motion. Opposing Counsel are invited provide the respective responses.

Respectfully Submitted,

MARGOLIS EDELSTEIN

By:



JAMES S. EHRMAN, ESQUIRE

**BEFORE THE
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v.

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CERTIFICATE OF SERVICE

I hereby certify that the a true copy of the within Motion to Strike has been served by e-mail upon the following:

Judge Mark Hoyer

Via E-Mail: mhoyer@pa.gov

Margaret Morris

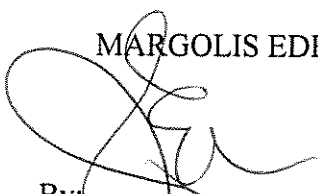
Via E-Mail: mmorris@regerlaw.com

Sarah Stoner

Via E-Mail: stoner@eckertseamans.com

Respectfully Submitted,

MARGOLIS EDELSTEIN



By:

JAMES S. EHRMAN, ESQUIRE

JANUARY 26, 2015

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ASHLEY HARPLE	:	
	:	
v.	:	
	:	Docket No. C-2014-2434701
PENNSYLVANIA ELECTRIC COMPANY	:	

MOTION TO STRIKE CERTIFICATE OF SATISFACTION

AND NOW comes the Complainant, by her attorneys, James S. Ehrman and Margolis Edelstein and files the within Motion and in support sets forth the following:

1. An e-mail was received by Complainant’s counsel from the Honorable Mark Hoyer advising counsel that a pre-trial hearing was to be scheduled February 2015 on or about 01/15/15, but also that a Certificate of Satisfaction had been filed by North American Power & Gas Company.
2. This was the first opportunity by Complainant’s Counsel to know that a Certificate of Satisfaction had been filed in favor of North American Power and Gas Co.
3. Although the P.U.C. docket reflects the filing on or about November 11, 2014, Complainant’s counsel was never served with the Certificate of Satisfaction until Judge Hoyer’s e-mail of 01/15/15.
4. On the following day, 01/16/15, Complainant’s counsel made phone calls to North American Power & Gas asking for the explanation of the Certificate of Satisfaction.
5. On January 19, Counsel for North American Power, Sarah Stoner, on January 20, responded that Ashley Harple had signed a check issued by North American Power in the amount of \$442.10. Please find attached to this both sides of the check to Ms. Harple marked as Exhibit “A”.
6. Complainant argues the Certificate of Satisfaction should be stricken by this

Honorable Court the following reasons:

- (a) North American Power & Gas Services dealt directly with Complainant in violation of the rules herein requiring notification and service to the counsel for the Complainant;
- (b) That the date of the check issued June 26, 2014 was before the Joinder of North American Power & Gas Company in these proceedings at a time when no formal Complaint had been filed against North American Power & Gas Service;
- (c) That the amount of the satisfaction of \$442.10 is unexplained as to what that amount represents;
- (d) That the lack of specific language releasing North American Power & Gas Services fails to permit the issuance of a Certificate of Satisfaction;
- (e) That no valid contract was entered into between the parties by the issuance of a check is attached herein and that the Certificate of Satisfaction must be stricken off.

WHEREFORE, Complainant requests your Honor Court to strike the Certificate of Satisfaction off the docket.

Respectfully Submitted,

MARGOLIS EDELSTEIN

By: 

JAMES S. EHRMAN, ESQUIRE

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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v.

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Docket No. C-2014-2434701

ORDER OF COURT

AND NOW, to wit, _____ day of _____, it is hereby ORDERED that the Certificate of Satisfaction be marked stricken and matters proceed against North American Power & Gas Services with their filing an Answer within 20 days hereof.

BY THE COURT:

J.