

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

SCOTT LUELLEN,

Complainant

v.

Docket C-2016-2539599

MAROADI TRANSFER & STORAGE, INC.

1801 Lincoln Hwy, North Versailles, PA 15137

Respondent

COMPLAINANT'S SECOND INTERROGATORIES

INSTRUCTIONS:

Complainant(s) hereby make demand that the Respondent(s) answer the following Interrogatories pursuant to the Pennsylvania Rules of Civil Procedure 4001 et seq. These Interrogatories must be answered as provided in Pa. R.C.P. 4006 and the Answers must be served on all other parties within thirty (30) days after the Interrogatories are deemed served. These Interrogatories are deemed to be continuing as to require the filing of Supplemental Answers promptly in the event Respondent(s) or their representatives (including counsel) learn additional facts not set forth in its original Answers or discover that information provided in the Answers is erroneous. Such Supplemental Answers may be filed from time to time, but not later than 30 days after such further information is received, pursuant to Pa. R.C.P. 4007.4. These Interrogatories are addressed to you as a party to this action; your answers shall be based upon information known to you or in the possession, custody or control of you, your attorney or other representative acting on your behalf whether in preparation for litigation or otherwise. These Interrogatories must be answered completely and specifically by you in writing and must be

verified. The fact that investigation is continuing or that discovery is not complete shall not be used as an excuse for failure to answer each interrogatory as completely as possible. The omission of any name, fact, or other item of information from the Answers shall be deemed a representation that such name, fact, or other item was not known to Respondent(s), their counsel, or other representatives at the time of service of the Answers. If another motor vehicle was not involved in the alleged accident, then interpret any questions to include a non-motor vehicle (i.e. pedestrian, bicycle, etc.).

1. Identify by name, title, home address, telephone numbers, and e-mail addresses each and every employee, contractor, or subcontractor that had contact with Ms. Drago or Complainant related to this job, what Respondent believes the contact to have been, when, and why, including to enable service of subpoenas for deposition on potential witnesses.
2. Identify by name, physical address, account number, and telephone number, including each and every email address owned or controlled by Respondent, the Respondent's Internet Service Provider (ISP) or other technology providers the service of a *subpoena duces tecum* upon would allow for complete e-discovery of any and all messages sent or received by Respondent directly or indirectly related to this case.
3. Identify each and every member, or shareholder, of Respondent and any and all related or holding companies, including their name, home address, telephone number and e-mail addresses.
4. Detail each and every reason Respondent's license to operate as a motor carrier was involuntarily revoked by the Federal Motor Carrier Safety Administration in the months prior to the incident.

VERIFICATION

I, Scott Luellen, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904.

/s/ _____
Scott Luellen
14 Marlboro Street
Belmont, MA 02478
Tel. 412-915-7468
E-mail: SEricLuellen@gmail.com

Wednesday, June 29, 2016
Date:

CERTIFICATE OF SERVICE

I, Scott Luellen, hereby certify that a true and correct copy of the foregoing motion was sent via pre-paid, first-class US Postal Service to John A. Pillar, Esq., Counsel for Respondent MAROADI, 150 Green Commons Drive, Pittsburgh, PA 15243 on or before Tuesday, the 29th day of June 2016.¹

/s/ _____
Scott Luellen
14 Marlboro Street
Belmont, MA 02478
Tel. 412-915-7468
E-mail: SEricLuellen@gmail.com

Wednesday, June 29, 2016
Date:

¹ A courtesy copy was also sent to Mr. Pillar via his electronic mail address found on the pleadings (pillarlaw@verizon.net) and to the General Manager (JMessmer@maroadi.com) and owner (Mary@Maroadi.com) of MAROADI MOVING & STORAGE, Inc.