



JOHN A. PILLAR

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June 17, 2016

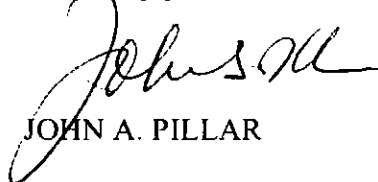
Re: Scott Luellen v.
Maroadi Transfer & Storage, Inc.
Docket C-2016-2539599

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265

Dear Secretary Chiavetta:

Enclosed herewith for filing is a **Motion to Strike Complainant's Reply to Respondent's Answer to Amended Formal Complaint**, in connection with the above case. A Certificate of Service is also enclosed which shows that a copy of the Motion was served by first-class mail, postage prepaid, and by e-mail, on the Complainant.

Very truly yours,



JOHN A. PILLAR

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Enclosures

cc: Hon. Stephen K. Haas, Administrative Law Judge
Scott Luellen
Maroadi Transfer & Storage, Inc.

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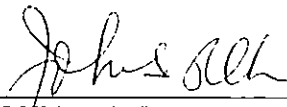
Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

SCOTT LUELLEN,)	
Complainant,)	
)	
v.)	Docket C-2016-2539599
)	
MARODI TRANSFER &)	
STORAGE, INC.,)	
Respondent.)	

NOTICE TO PLEAD

Pursuant to 52 Pa. Code §5.103(b), you are hereby notified that a response to the attached Motion to Strike Complainant's Reply to Respondent's Answer to Amended Formal Complaint must be filed within twenty (20) days from the date of service of the Motion. All pleadings, such as a response to the enclosed Motion, must be filed with the Secretary of the Pennsylvania Public Utility Commission with copies served on all other parties to this proceeding.

Dated this 17th day of June, 2016.



JOHN A. PILLAR
Attorney for MARODI TRANSFER &
STORAGE, INC., Respondent

John A. Pillar
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Pittsburgh, PA 15243
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Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

SCOTT LUELLEN,)	
Complainant,)	
)	
v.)	Docket C-2016-2539599
)	
MAROADI TRANSFER &)	
STORAGE, INC.,)	
Respondent.)	

**MOTION TO STRIKE COMPLAINANT’S REPLY
TO RESPONDENT’S ANSWER TO AMENDED FORMAL COMPLAINT**

AND NOW COMES Respondent, Maroadi Transfer & Storage, Inc., by its attorney, John A. Pillar, and presents the following motion to strike the Complainant’s reply to the Respondent’s Answer to the Amended Formal Complaint, and in support thereof states as follows.

1. On or about May 25, 2016, Respondent filed an Answer to the Amended Formal Complaint in the above docketed proceeding and New Matter.


2. Complainant has filed a pleading entitled “Complainant’s Answer to Respondent’s “New Matter” & Reply to Respondent’s Answer to Amended Formal Complaint”. Paragraphs 1 through 40 of the Complainant’s Answer are directed to the Respondent’s Answer to the Amended Formal Complaint. Paragraphs 41 through 50 of the Complainant’s Answer relate to the New Matter raised by the Respondent to the Amended Formal Complaint.

3. The Rules of Practice of the Pennsylvania Public Utility Commission (Commission) do not permit the filing of an answer to an answer.

4. Paragraphs 1 through 40 of the Complainant's pleading are simply a commentary on the Answer filed by Respondent to the Amended Formal Complaint. They contain legal arguments relating to pleadings, reargue factual allegations raised in the Amended Formal Complaint, and comment on the Answer Respondent filed to the Amended Formal Complaint.

WHEREFORE, Respondent submits that the Commission's Rules of Practice do not permit the filing of an answer to an answer and, therefore, requests that paragraphs 1 through 40 of the Complainant's "Reply to Respondent's Answer to Amended Formal Complaint" be stricken.

Respectfully submitted,



JOHN A. PILLAR
Attorney for MAROADI TRANSFER &
STORAGE, INC., Respondent

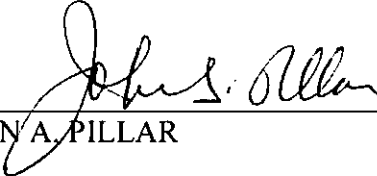
John A. Pillar
Attorney at Law
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e-mail: pillarlaw@verizon.net

CERTIFICATE OF SERVICE

I, JOHN A. PILLAR, hereby certify that I have this day served a true and correct copy of the within **Motion to Strike Complainant's Reply to Respondent's Answer to Amended Formal Complaint** in the above proceeding upon the Complainant, properly addressed, postage prepaid, and mailed as follows:

Scott Luellen
14 Marlboro Street
Belmont, MA 02478

Dated at Pittsburgh, PA this 17th day of June 2016.



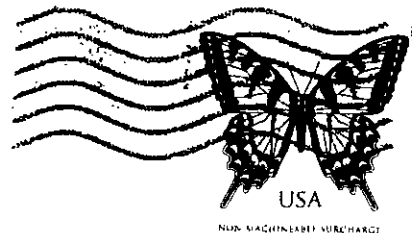
JOHN A. PILLAR



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PITTSBURGH PA 150

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