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June 17, 2016

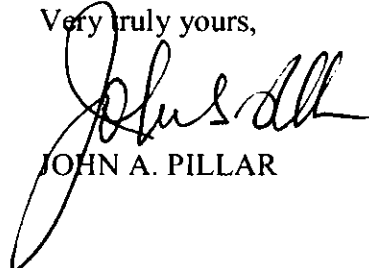
Re: Scott Luellen v.
Maroadi Transfer & Storage, Inc.
Docket C-2016-2539599

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

Dear Secretary Chiavetta:

Enclosed herewith for filing are **Objections of Maroadi Transfer & Storage, Inc. to Complainant's First Interrogatories Directed to Respondent**, in connection with the above case. A copy of the Objections has been served on the Complainant.

Very truly yours,



JOHN A. PILLAR

sw

Enclosures

cc: Hon. Stephen K. Haas, Administrative Law Judge (w/encl.)
Scott Luellen (w/encl.)
Maroadi Transfer & Storage, Inc. (w/encl.)

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SECRETARY'S BUREAU

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Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

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**OBJECTIONS OF MAROADI TRANSFER & STORAGE, INC.
TO COMPLAINANT'S FIRST INTERROGATORIES TO RESPONDENT**

Pursuant to 52 Pa. Code §5.342c and §5.342e, Maroadi Transfer & Storage, Inc. (hereinafter Maroadi or Respondent) hereby objects to the following Interrogatories served by Complainant on or about June 9, 2016 as follows.

Interrogatory #1. State:

- (a) For any and all individuals named or referred to: Full name (maiden name, if applicable), alias(es), date of birth, marital status (name of spouse) at the time the cause of action arose and currently, residence and business addresses at time of cause of action and currently and Social Security Number.
- (b) For any and all corporations named or referenced: registered corporation name, domicile of registration, principal place of business and registered address for service of process at the time the cause of action arose and currently, including the full name, title and physical address of every manager, officer and owner, and if owner, the proportionality of each owner. If the owner is a corporation, provide said information for the ultimate beneficial or legal owners.

OBJECTION. Respondent objects to Interrogatory #1 on the following bases.

- (a) The Interrogatory is vague and ambiguous, does not identify any individual, corporation or partnership to which it has reference, does not indicate the subject matter of the interrogatory and fails to provide a time frame.
- (b) The Interrogatory seeks information which is irrelevant, not material to the subject matter involved in this proceeding, nor is it reasonably calculated to lead to the discovery of relevant information.
- (c) Respondent objects to this Interrogatory since, even if it requests relevant information, calls for the disclosure of confidential or private information such as social security numbers, marital status, residence addresses, proportionality of ownership of entities, dates of birth, and other confidential information.

Interrogatory #2. If you (and/or your operator) were/are employed, state:

- (a) By whom, at the time the cause of action arose and currently;
- (b) Your title or position and accompanying duties and responsibilities at the time the cause of action arose and currently; and
- (c) The length of your employment as of the time the cause of action arose and currently.

OBJECTION. Respondent objects to Interrogatory #2 on the basis that the interrogatory fails to identify the name of the person about which the information is requested and is otherwise vague, ambiguous and seeks information which is irrelevant and not material to the subject matter involved in this proceeding nor is it reasonably calculated to lead to discovery of relevant information.

Interrogatory #5. If you (or any employee, contractor, agent, subcontractor, affiliate, or operator) ever had a driver's license suspended or revoked, state:

- (a) When, where and by whom it was suspended or revoked;
- (b) The reason(s) for such suspension or revocation;
- (c) The period of such suspension or revocation;
- (d) Whether such suspension or revocation was lifted and if so, when.

OBJECTION. Respondent objects to Interrogatory #5 on the basis that the interrogatory fails to identify the person to whom this interrogatory is directed, and as a general question involving all employees, contractors, agents, subcontractors, affiliates or operators of Respondent, the request seeks information that is irrelevant and not material to the subject matter involved in this proceeding nor is it reasonably calculated to lead to discovery of relevant information.

Interrogatory #6. If you (or any employee, contractor, agent, subcontractor, affiliate or operator) have had a claim made against you for any form of negligence or damage within the last five (5) years, state:

- (a) Your applicable motor vehicle liability insurance benefits at the time that cause of action arose;
- (b) The Commonwealth or State, County, Court, Term and Number of any lawsuits arising from that cause of action.

OBJECTION. Respondent objects to Interrogatory #6 for the following reasons:

- (a) This interrogatory seeks information which is irrelevant, not material to the subject matter involved in this proceeding nor is it reasonably calculated to lead to discovery of relevant information.
- (b) The interrogatory requests information regarding non-parties to this case and which is confidential and not admissible as evidence pursuant to 52 Pa. Code §5.231(d).

Interrogatory #10. Detail each and every, any and all fact, doctrine and legal defense on which you will rely on trial and any and all supporting precedents, case law, statute or rule.

OBJECTION. Respondent objects to Interrogatory #10 in that it seeks legal opinion and/or legal memoranda that is not evidence and which is, therefore, not discoverable under the Commission's Rules of Practice.

Interrogatory #12. List any and all reasons, arguments, case law or legal doctrines on which you will rely at trial that refute your responsibility under a legal doctrine of *respondent superior*.

OBJECTION. Respondent objects to Interrogatory #12 in that it seeks legal opinion and/or legal memoranda that is not evidence and which is, therefore, not discoverable under the Commission's Rules of Practice.

Interrogatory #14. Detail each and every act, by whom, when, why and how you complied with Title 52, Part 1, Subpart B, Chapter 32, Subchapter B, Section 32.16(2), entitled "Standards for the Adjustment and Payment of Claims: Failing to Acknowledge and Act Promptly Upon Written or Oral Communication with Respect to Insurance Claims".

OBJECTION. Respondent objects to Interrogatory #14 in that it seeks legal opinion and/or legal memoranda that is not evidence and which is, therefore, not discoverable under the Commission's Rules of Practice and the subject matter of the request is vague, ambiguous, and not calculated to lead to discovery of relevant information.

Interrogatory #15. Detail each and every act, by whom, when, why, and how you complied with Title 52, Part 1, Subpart B, Chapter 32, Subchapter B, Section 32.16(6) entitled "Standards for the Adjustment and Payment of Claims: Not Attempting in Good Faith to Effectuate Prompt, Fair, and Equitable Settlement of Claims".

OBJECTION. Respondent objects to Interrogatory #15 in that it seeks legal opinion and/or legal memoranda that is not evidence and which is, therefore, not discoverable under the Commission's Rules of Practice and the subject matter of the request is vague, ambiguous, and not calculated to lead to the discovery of relevant information.

Interrogatory #16. If you contend that Complainant was guilty of comparative/contributory negligence, then fully and specifically describe upon what conduct, acts or omissions of Complainant you base your contention.

OBJECTION. Respondent objects to Interrogatory #16 in that it seeks legal opinion and/or legal memoranda that is not evidence and which is, therefore, not discoverable under the Commission's Rules of Practice.

Interrogatory #17. If you have made any claim for benefits under the Pennsylvania Motor Vehicle Financial Responsibility Law, or any similarly applicable State Statute or Act, or for any other benefits from any insurance carrier in the last ten (10) years, then state:

- (a) The name of the insurance company to whom the claim was submitted;
- (b) The applicable claim number;

- (c) The name of the individual at the company who supervised your claim;
- (d) The total amount of healthcare professionals' charges (i.e. medical bills) claimed;
- (e) The total amount of wage-loss claimed;
- (f) The total amount of any other economic losses and/or damages claimed (i.e. property damage);
- (g) The total amount of healthcare professionals' charges, wage loss and/or other economic losses and/or damages actually paid pursuant to such law, Statute or Act.

OBJECTION.

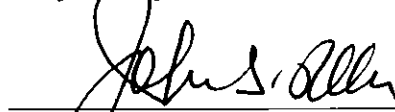
- (a) Respondent objects to Interrogatory #17 in that the information sought is irrelevant, not material to the subject matter involved in this proceeding nor is it reasonably calculated to lead to the discovery of relevant information.
- (b) Respondent objects to this interrogatory to the extent that the interrogatory is seeking information that would require Maroadi to undertake a costly, time-consuming and unreasonable investigation which would not lead to relevant and material evidence pertaining to this complaint.

Interrogatory #22. State the complete electronic mail address, owner, individuals with access to it, full legal name and physical address of any related Internet Service Provider or email provider, and account number such that Complainant may subpoena any and all emails in this matter without regard to those that may have been deleted or not provided by Respondent.

OBJECTION. Respondent objects to Interrogatory #22 for the following reasons:

- (a) The information requested is irrelevant, not material to the subject matter involved in this proceeding nor is it reasonably calculated to lead to the discovery of relevant information.
- (b) Maroadi also objects to the extent that this interrogatory is seeking information related to confidential matters dealing with the Respondent's internet service and is not information that Respondent would otherwise allow to be made public.

Respectfully submitted,



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

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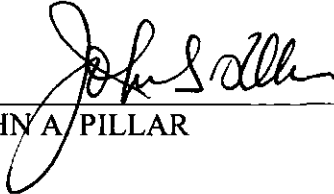
CERTIFICATE OF SERVICE

I, JOHN A. PILLAR, hereby certify that I have this day served a true and correct copy of the within **Objections of Maroadi Transfer & Storage, Inc. to Complainant's First Interrogatories to Respondent** in the above proceeding as follows:

Hon. Steven K. Haas (via first-class mail)
Administrative Law Judge
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265

Scott Luellen (via first-class mail)
14 Marlboro Street
Belmont, MA 02478

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

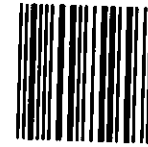


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LAW OFFICES OF
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Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
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Harrisburg, PA 17105-3265