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300 Mt. Lebanon Blvd.
Suite 220-A
Pittsburgh, PA 15234

July 8, 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

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2016 JUL 11 AM 10:38
PA P.U.C.
SECRETARY'S BUREAU

Dear Secretary Chiavetta:

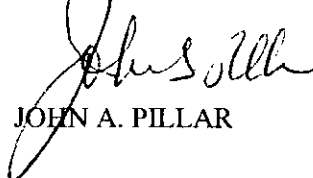
I represent Maroadi Transfer & Storage, Inc., the Respondent in the above-docketed proceeding. In response to a series of motions and pleadings filed by the Complainant, I am enclosing the following pleadings on behalf of the Respondent:

1. Respondent's Reply to Complainant's Pleading Entitled "Complainant's (sic) Motion to Construe Reply to Respondent's Answer as Motion to Strike Answer As Untimely & Motion to Deem Complaint Admitted (Section 5.1(a)(6))";
2. Respondent's Reply to Complainant's First Motion for Sanctions;
3. Respondent's Reply to Complainant's (sic) First Motion to Compel Answers to Interrogatories and Production of Documents; and
4. Respondent's Reply to Complainant's First Motion for Judgment on the Pleadings.

Each of Respondent's pleadings contains a Certificate of Service indicating that copies have been served on the Complainant and Honorable Steven K. Haas, Administrative Law Judge.

Please acknowledge receipt of the enclosures on the duplicate of this letter of transmittal and return it in the stamped, self-addressed envelope enclosed for that purpose.

Very truly yours,



JOHN A. PILLAR

sw

Enclosures

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

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Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION 2016 JUL 11 AM 10:39

SCOTT LUELLEN,)
Complainant,)
)
v.)
)
MAROADI TRANSFER &)
STORAGE, INC.,)
Respondent.)

PA P.U.C.
SECRETARY'S BUREAU

Docket C-2016-2539599

RESPONDENT'S REPLY TO COMPLAINANT'S PLEADING ENTITLED

"COMPLAINANT'S (sic) MOTION TO CONSTRUE REPLY TO RESPONDENT'S ANSWER AS MOTION TO STRIKE ANSWER AS UNTIMELY & MOTION TO DEEM COMPLAINT ADMITTED (Section 5.1(a)(6))"

NOW COMES Maroadi Transfer & Storage, Inc. (hereinafter referred to as Maroadi or Respondent), by its attorney, John A. Pillar, and submits the following reply to the Complainant's Motion described hereinabove.

1. Respondent received the Commission's letter dated May 4, 2016, directing it to file an answer to the Complainant's Amended Formal Complaint, on May 6, 2016. Respondent's Preliminary Objections to the Amended Formal Complaint as well as its Answer and New Matter were received by the Commission on May 26, 2016. Respondent's pleadings were timely filed.

2. Respondent not only answered each and every allegation of the Amended Formal Complaint but also filed New Matter and Preliminary Objections, all of which were timely received by the Commission.

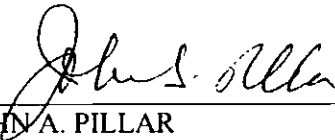
3. Respondent has not refused to answer any questions or averments contained in the Amended Formal Complaint, including averments that pertain to the alleged liability of other carriers.

4. Respondent understands that Complainant is acting *pro se* in this proceeding. In his pleading entitled "Complainant's Answer to Respondent's "New Matter" & Reply to Respondent's Answer to Amended to Formal Complaint", Complainant submitted 40 paragraphs consisting of a reply to

the Respondent's Answer to the Amended Formal Complaint. Respondent filed a Motion to Strike Complainant's Reply to Respondent's Answer to the Amended Formal Company for the reason that the Rules of Practice of the Commission do not permit such a reply. Complainant appears to contend that because he is acting *pro se*, this Commission should waive the requirement for formal pleadings whenever necessary or appropriate for substantial justice. Notwithstanding, Respondent maintains its Motion to Strike Complainant's Reply to Respondent's Answer to the Amended Formal Complaint should be granted. No useful purpose is served by repeating factual averments contained in prior pleadings as a form of response to a formal answer.

WHEREFORE, Respondent respectfully requests that the Complainant's Motion be denied.

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:

RESPONDENT'S REPLY TO COMPLAINANT'S PLEADING ENTITLED

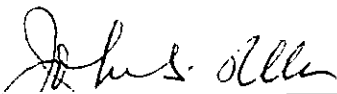
"COMPLAINANT'S (sic) MOTION TO CONSTRUE REPLY TO RESPONDENT'S ANSWER AS MOTION TO STRIKE ANSWER AS UNTIMELY & MOTION TO DEEM COMPLAINT ADMITTED (Section 5.1(a)(6))"

in the above proceeding upon the following, properly addressed, postage prepaid, and mailed as follows:

Hon. Steven K. Haas, Administrative Law Judge
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265

Scott Luellen
14 Marlboro Street
Belmont, MA 02478

Dated at Pittsburgh, PA this 8th day of July 2016.



JOHN A. PILLAR

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