

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

PA P.U.C.
SECRETARY'S BUREAU

**REPLY TO COMPLAINTANT'S (sic) FIRST MOTION TO COMPEL
ANSWERS TO INTERROGATORIES AND PRODUCTION OF DOCUMENTS**

AND NOW COMES Maroadi Transfer & Storage, Inc. (Maroadi or Respondent) and submits the following answer to the above-captioned Motion.

In this proceeding, Complainant has filed a Formal Complaint and an Amended Formal Complaint seeking to recover damages from the Respondent for an alleged personal injury which occurred in December of 2014. At the time of the alleged incident, a truck provided by Shamrock Moving & Storage and operated by its personnel was loading a shipment of household goods for Katherine Drago to be moved from Pittsburgh to Massachusetts. Neither Respondent's vehicle nor personnel were involved in any way in the loading of the shipment nor in supervising the service performed by Shamrock Moving & Storage.

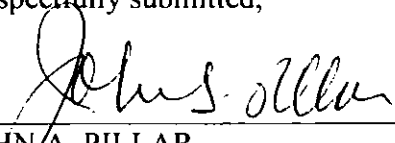
Complainant filed Interrogatories and Request for Production of Documents on Respondent. Respondent objected to a number of the interrogatories and the Request for Production of Documents and answered some of the interrogatories which were not considered objectionable. Complainant now moves to compel Respondent to answer all interrogatories and produce all documents requested.

Generally, Complainant argues that because the Interrogatories were taken from a form book allegedly recommended by the Pennsylvania Bar Association, the Interrogatories cannot be considered overly broad, burdensome or objectionable. Respondent submits that the fact that the Interrogatories were copied from a form book does not compel an answer if the Interrogatories are otherwise objectionable for the reasons set forth in Respondent's Objections.

Respondent filed Preliminary Objections to the Complaint and Amended Complaint since the Commission does not have jurisdiction over awarding damages for personal injuries. Respondent provided Complainant with all of the documents it has relating to Complainant which consisted of several e-mails, all of which were attached to Respondent's Partial Production and Objections to Complainant's First Request for Production of Documents as Exhibit 1. The e-mails are self-explanatory. Respondent conducted no investigation of this alleged personal injury to Complainant since its vehicle and personnel were not involved in the loading of the shipment at which time Complainant was allegedly injured.

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

Respectfully submitted,



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

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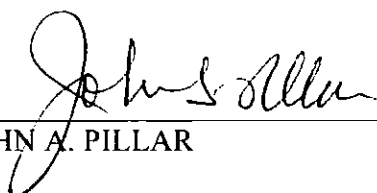
CERTIFICATE OF SERVICE

I, JOHN A. PILLAR, hereby certify that I have this day served a true and correct copy of the within **Reply to Complainant's (sic) First Motion to Compel Answers to Interrogatories and Production of Documents** 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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