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Hours by Appointment Only at:
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

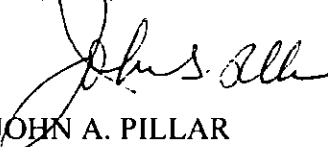
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SECRETARY'S BUREAU

Dear Secretary Chiavetta:

Enclosed herewith for filing is the original **Objections of Maroadi Transfer & Storage, Inc. to Complainant's Second Interrogatories**, in connection with the above case. A true copy of the Objections has been served on the Complainant and on the Honorable Steven K. Haas, Administrative Law Judge.

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

Very truly yours,


JOHN A. PILLAR

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Enclosures

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

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

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

Pursuant to 52 Pa. Code §§5.342c and 5.342e, Maroadi Transfer & Storage, Inc. (hereinafter Maroadi or Respondent) hereby objects to certain interrogatories contained in Complainant's Second Interrogatories to Respondent, as follows.

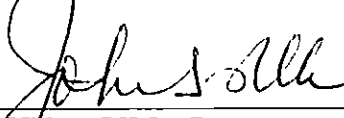
Interrogatory #2. Identify by name, physical address, account number and telephone number including each and every e-mail address owned or controlled by Respondent, the Respondent's internet service provider (ISP) or other technology providers the service of a subpoena duces tecum upon would allow for a complete e-discovery of any and all messages sent or received by Respondent directly or indirectly related to this case.

OBJECTION. Respondent objects to this Interrogatory since it calls for the disclosure of confidential or private information, particularly Respondent's internet service provider or other technology providers, which information Respondent considers proprietary. Respondent further objects on the basis that the request is unduly broad and does not lead to the discovery of relevant information relating to the subject matter of this case.

Interrogatory #3. Identify each and every member or shareholder, of Respondent and any and all related holding companies, including their name, home address, telephone number and e-mail addresses.

OBJECTION. This Interrogatory seeks information that is proprietary, and which is not relevant or material to the subject matter involved in this complaint proceeding. Furthermore, the home addresses, telephone numbers and e-mail addresses of shareholders of the Respondent are not relevant or material to the subject matter involved in this proceeding.

Respectfully submitted,



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

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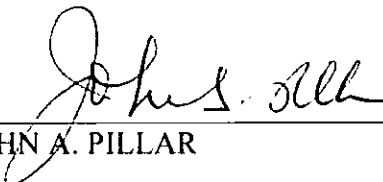
CERTIFICATE OF SERVICE

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 Second Interrogatories** 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 8th day of July 2016.

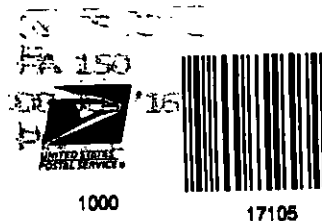


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Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
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