

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

SCOTT LUELLEN,
Complainant

v.

Complaint Docket
No. C-2016-2539599

MAROADI TRANSFER &
STORAGE, INC.,
Respondent

**RESPONDENT, MAROADI TRANSFER & STORAGE, INC.'S RESPONSE TO
COMPLAINANT'S AMENDED MOTION FOR SUMMARY JUDGMENT**

Respondent, MAROADI TRANSFER & STORAGE, INC. (hereinafter "Maroadi"), by its attorneys, Marshall, Dennehey, Warner, Coleman & Goggin, hereby submit the following response to Complainant's Amended Motion for Summary Judgment as follows:

1. Denied as stated. By way of further response, paragraph 1 references a contract that is a written document and speaks for itself.
2. Denied as stated.
3. Denied as stated.
4. Denied as stated.
5. Denied as stated. By way of further response, this paragraph references a written document that speaks for itself.
6. Denied as stated. By way of further response, this paragraph references a written document that speaks for itself.

7. Denied as stated. By way of further response, this paragraph references a written document that speaks for itself.

8. Denied as stated. By way of further response, this paragraph references a written document that speaks for itself.

9. Paragraph 9, including subparagraphs (a) through (f) is denied in its entirety.

10. Denied as stated. It is further denied that any representative of Maroadi Transfer and Storage, Inc. falsified anything to this Commission at any point in this proceeding. By way of further response, this paragraph references a written document which speaks for itself.

11. Denied as stated. By way of further response, this paragraph references a written document which speaks for itself.

12. Denied as stated.

13. Denied as stated.

14. Admitted in part and denied in part. It is admitted that there was a pre-hearing conference with the Court and all parties on October 5, 2016. The remainder of the contentions in paragraph 14 are denied.

15. Denied as stated. This paragraph references a Court Order which speaks for itself.

16. Denied.

17. Admitted in part and denied in part. It is admitted that the jurisdiction of the Pennsylvania Public Utilities Commission is limited to interstate commerce under 66 Pa. C.S. §701. The remainder of the contentions contained in this paragraph are denied.

18. Denied.

19. Denied.

20. Denied.

21. Denied.

WHEREFORE, Respondent MAROADI TRANSFER & STORAGE, INC., respectfully requests that this Honorable Court grant its Motion for Summary Judgment and dismiss Luellen's Amended Complaint in its entirety.

Respectfully submitted,

**MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN**



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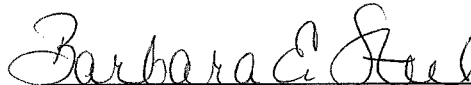
(717) 651-3505

Dated: *DECEMBER 2, 2014*

CERTIFICATE OF SERVICE

I, Barbara E. Steel, an employee of Marshall, Dennehey, Warner, Coleman & Goggin, do hereby certify that on this 2 day of December, 2016, I served a copy of the foregoing document, via electronic mail, as follows:

Scott Luellen
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Barbara E. Steel