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Joanne M. Fiorito  
173 Brookside Rd.  
Tunkhannock, PA 18657  
Phone: 570.836.1734

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

October 19, 2017

**Via Priority Express Mail with Signed Return Receipt**

Rosemary Chiavetta, Esquire  
Secretary  
PA Public Utility Commission  
Commonwealth Keystone Building, 2 North  
P.O. 3265  
Harrisburg, PA 17105-3265

Re: Docket No. C-2017-2610125  
Joanne M. Fiorito v. Pennsylvania Electric Company  
Interrogatories and Requests for Production of Documents of Penelec

Dear Secretary Chiavetta,

In accordance with 52 Pa. Code §5.365, I, Joanne M. Fiorito hereby file this petition order to limit the disclosure of trade secrets or other confidential information on the public record. In support of this request, I aver as follows:

**PETITION FOR PROTECTION ORDER**

1. Having graduated ARTI (Audio Research Technology Institute) back in 1986, I signed a contract of non-disclosure involving what I learned, therefore, based upon that contract I cannot divulge what I have learned based upon that trade secret, without violating that contract. Additionally, it is requested that questions 1, 2, 4, 5 and 6 of the Interrogatory process (aka Disclosure) be stricken from the record and not be allowed in the courtroom, since this line of questioning violates my US Constitution rights to privacy.
2. The line of questioning Penelec's attorney Margaret A. Morris, Esquire asks concerning my medical health, violates HIPAA LAW. Therefore, it is requested that questions 29 through 36 of the Interrogatory process (aka Disclosure) be stricken from the record and not be allowed in the courtroom

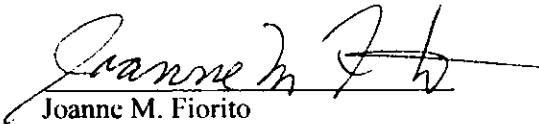
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setting.

WHEREFORE, I, Joanne M. Fiorito respectfully request that the protective order be attached to my current case file as Exhibit I hereto be entered.

Respectfully submitted,

Dated: October 19, 2017

  
Joanne M. Fiorito

**Re: Docket No. C-2017-2610125**  
**Joanne M. Fiorito v. Pennsylvania Electric Company**  
**Interrogatories and Requests for Production of Documents of Penelec**

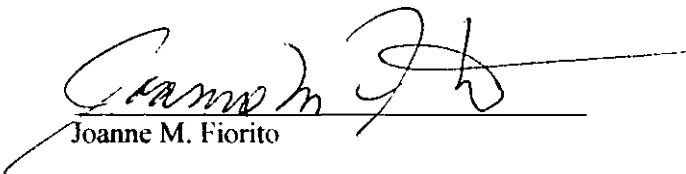
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Margaret A. Morris, Esquire  
Cira Centre, 13<sup>th</sup> Floor  
2929 Arch Street  
Philadelphia, PA 19104

Dated: October 19, 2017

  
Joanne M. Fiorito



**JOANNE M FIORITO**

173 BROOKSIDE RD

TUNKHANNOCK PA 18657-6828

ROSEMARY CHIAVETTA, ESQUIRE  
Secretary

PA Public Utility Commission

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*Rosemarie Chiavetta, Esq.*  
*Secretary*  
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