



17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
717-731-1970 Main
717-731-1985 Main Fax
www.postschell.com

Devin Ryan

dryan@postschell.com
717-612-6052 Direct
717-731-1985 Direct Fax
File #: 167945

June 25, 2018

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Kathleen R. Anthony v. PPL Electric Utilities Corporation
Docket No. C-2018-3000490

Dear Secretary Chiavetta:

Enclosed for filing is the Motion of PPL Electric Utilities Corporation to Dismiss Objections and Compel Responses to Discovery Propounded on Kathleen R. Anthony – Set I, in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Devin Ryan

DTR/jl
Enclosures

cc: Honorable Elizabeth Barnes
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA EMAIL & FIRST CLASS MAIL

Kathleen R. Anthony
505 Norway Place
Bethlehem, PA 18015-4435
Kranthony7@gmail.com

Date: June 25, 2018



Devin T. Ryan

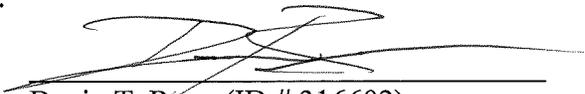
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Kathleen R. Anthony,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2018-3000490
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

NOTICE TO PLEAD

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.342(g)(1), YOU MAY FILE A REPLY TO THE ENCLOSED MOTION TO COMPEL WITHIN FIVE (5) DAYS AFTER THE DATE OF SERVICE. YOUR REPLY SHOULD BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY OF YOUR REPLY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL.

Kimberly A. Klock (ID # 89716)
Amy E. Hirakis (ID # 310094)
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18101
Phone: 610-774-4254
Fax: 610-774-4102
E-mail: kklock@pplweb.com
aehirakis@pplweb.com



Devin T. Ryan (ID # 316602)
Garrett P. Lent (ID # 321566)
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dryan@postschell.com
glent@postschell.com

Curtis S. Renner (DC ID # 446187)
Watson & Renner
1101 14th Street, NW
Suite 350 - ENS
Washington, DC 20005
(202) 737 6302
crenner@w-r.com

Date: June 25, 2018

Attorneys for PPL Electric Utilities Corporation

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Kathleen R. Anthony,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2018-3000490
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

**MOTION OF PPL ELECTRIC UTILITIES CORPORATION TO
DISMISS OBJECTIONS AND COMPEL RESPONSES TO
DISCOVERY PROPOUNDED ON KATHLEEN R. ANTHONY – SET I**

TO ADMINISTRATIVE LAW JUDGE ELIZABETH H. BARNES:

Pursuant to 52 Pa. Code §§ 5.342(g) and 5.349(d), PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby files this Motion to Dismiss Objections and Compel Responses to Discovery Propounded on Kathleen R. Anthony (“Complainant”) – Set I. In support of its Motion, PPL Electric states as follows:

I. INTRODUCTION

1. On June 6, 2018, PPL Electric served Interrogatories and Requests for Production of Documents on the Complainant – Set I (“PPL to Complainant Set I”) via email and first class mail. A true and correct copy of PPL to Complainant Set I is attached hereto and marked as **Appendix A.**

2. Pursuant to the Commission's regulations, objections to PPL to Complainant Set I were due on or before June 18, 2018, and responses would be due on or before June 29, 2018.¹

3. On June 14, 2018, the Complainant served her objections to PPL to Complainant Set I, Questions 2 and 3 via USPS mail, which are the subject of the instant Motion. The Complainant's objections and answers to PPL to Complainant Set I that are the subject of this Motion are attached hereto and marked as **Appendix B**.

4. On June 25, 2018, before filing the instant Motion, counsel for PPL Electric left a detailed voicemail and sent an email to the Complainant in an effort to resolve the objections informally.

5. The Company will continue to try to resolve the objection informally while the instant Motion is pending.

6. For the reasons explained below, PPL Electric respectfully requests that Administrative Law Judge Elizabeth H. Barnes (the "ALJ"): (1) dismiss the Complainant's objections to PPL to Complainant Set I, Questions 2 and 3 because they lack merit; and (2) compel full responses to those discovery requests.

II. MOTION TO COMPEL

7. PPL Electric requests that the ALJ dismiss the Complainant's objections and compel responses because such objections are without merit.

8. Under 52 Pa. Code § 5.321(c), a party is entitled to obtain discovery of any matter not privileged that is relevant to the pending proceeding, or any matter that is reasonably calculated to lead to the discovery of admissible evidence. Discovery is permitted regardless of

¹ Because the discovery was served via first-class mail by the United States Postal Service ("USPS"), three days were added to the prescribed period for response. *See* 52 Pa. Code § 1.56(b).

whether the information sought “relates to the claim or defense of the party seeking discovery or to the claim or defense of another party.” *Id.*

9. The Commission generally provides wide latitude in discovery matters. *See Pa. P.U.C. v. The Peoples Natural Gas Co.*, 62 Pa. P.U.C. 56 (Order Entered Aug. 26, 1986); *Pa. P.U.C. v. Equitable Gas Co.*, 61 Pa. P.U.C. 468 (Order Entered May 16, 1986).

10. An objection to a discovery request must “[r]estate the interrogatory or part thereof deemed objectionable and the specific ground for the objection.” 52 Pa. Code § 5.342(c)(2). Furthermore, the objection must “[i]nclude a description of the facts and circumstances purporting to justify the objection.” *Id.* § 5.342(c)(3); *see id.* § 5.350(d)(3) (stating that the “[g]rounds for objections” to a request for admission “must be specifically stated”).

11. Objections to interrogatories and requests for production of documents must be served within 10 days of the date the discovery was served. 52 Pa. Code §§ 5.342(e), 5.349(d). Objecting parties remain under an obligation to provide timely answers to interrogatories or subparts of interrogatories to which they did not object. *Id.* § 5.342(f). Further, objections must be contained in a document separate from an answer. *Id.* §§ 5.342(c), 5.349(d).²

12. As explained herein, the Complainant has failed to comply with the Commission’s discovery rules. For the reasons stated in more detail below, the ALJ should dismiss the Complainant’s objections as being without merit and should direct the Complainant to answer fully PPL to Complainant Set I, Questions 2 and 3.

² As seen in Appendix B, the Complainant did not serve objections separately and seeks to raise objections, for the first time, in her untimely answers to discovery.

A. THE COMPLAINANT’S OBJECTIONS ARE WITHOUT MERIT

13. The Complainant’s objections are without merit for several reasons, as detailed in the following sections.

1. The Complainant’s Objection to PPL to Complainant Set I, Question 2 Lacks Merit.

14. PPL to Complaint-I-2 provides:

Please identify all wireless phones, cellphones, microwaves, wireless routers, wifi networks, tablets, computers, Bluetooth speakers, wireless security systems, smart speakers (*e.g.*, Amazon Echo), garage door openers, baby monitors, and walkie talkies that are contained in or used in the house.

15. The Complainant’s objection to the question states:

Object to this request. It is overly burdensome and broad. It is not meant to illicit any relevant or significant testimony.

16. The Complainant’s objection lacks merit. The discovery request is reasonably narrow in its scope because the Complainant only must identify specific devices, appliances, and equipment that are contained in or used in the house. In fact, Section 5.321(c) of the Commission’s regulations specifically permits the discovery of “the existence, description, nature, content, custody, condition and location of any books, documents, or other tangible things” that are relevant to the proceeding. 52 Pa. Code § 5.321(c).

17. Here, a list of these devices, appliances, and equipment may reveal that the Complainant is already being exposed to radiofrequency (“RF”) transmissions that are far in excess of the Company’s new smart meter. Therefore, although there may be several such devices, identifying them is not an unduly burdensome task for the Complainant to complete, particularly when weighed against the exceptional relevance of this inquiry.

18. Further, the Complainant provides no “description of the facts and circumstances purporting to justify the objection,” as required by the Commission’s regulations. 52 Pa. Code § 5.342(c)(3).

19. For these reasons, the ALJ should dismiss the Complainant’s objection and direct them to answer fully PPL to Complainant, Question 2.

2. The Complainant’s Objection to PPL to Complainant, Question 3 Lacks Merit.

20. PPL to Complainant-I-3 provides:

Please state whether you or any member of your household uses a cell phone. If so, please provide the make and model of each cell phone and, for each phone identified, provide 12 months of phone bills or other records of actual cell phone usage.

21. The Complainant’s objection to the question states:

Object to this request. Again, it is overly burdensome and broad. It is not meant to illicit any relevant or significant testimony.

22. The Complainant’s objection to PPL to Complainant-I-3 is without merit. The discovery request is reasonably narrow in its scope because it only asks for the cell phone usage, if any, by the members of the Complainant’s household and documentation of their usage. As explained previously, Section 5.321(c) of the Commission’s regulations specifically permits the discovery of “the existence, description, nature, content, custody, condition and location of any books, documents, or other tangible things” that are relevant to the proceeding. 52 Pa. Code § 5.321(c).

23. Here, information about these cellphones and the persons’ usage may reveal that the Complainant is already being exposed to RF transmissions that are far in excess of the Company’s new smart meter. Further, the Complainant provided a “mobile” telephone number in her Complaint, so the Company has reason to believe that she indeed uses a cellphone.

(Complaint ¶ 1) Thus, PPL Electric's request is not unduly burdensome and broad, especially considering the exception relevance of the interrogatory.

24. Moreover, the Complainant provides no "description of the facts and circumstances purporting to justify the objection," as required by the Commission's regulations. 52 Pa. Code § 5.342(c)(3).

25. For these reasons, the ALJ should dismiss the objection and direct the Complainant to answer fully PPL to Complainant Set I, Question 3.

III. CONCLUSION

For the reasons set forth above, PPL Electric Utilities Corporation respectfully requests that Administrative Law Judge Elizabeth H. Barnes grant this Motion to Dismiss Objections and Compel Responses to Discovery and direct Kathleen R. Anthony to answer fully PPL to Complainant Set I, Questions 2 and 3, as described above within three (3) days from the date of the order.

Respectfully submitted,



Kimberly A. Klock (ID # 89716)
Amy E. Hirakis (ID # 310094)
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18101
Phone: 610-774-4254
Fax: 610-774-4102
E-mail: kklock@pplweb.com
aehirakis@pplweb.com

Devin T. Ryan (ID # 316602)
Garrett P. Lent (ID # 321566)
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dryan@postschell.com
glent@postschell.com

Curtis S. Renner (DC ID # 446187)
Watson & Renner
1101 14th Street, NW
Suite 350 - ENS
Washington, DC 20005
(202) 737 6302
crenner@w-r.com

Date: June 25, 2018

Attorneys for PPL Electric Utilities Corporation

APPENDIX A

Interrogatories and Requests for Production of Documents Propounded by PPL Electric Utilities Corporation on Kathleen R. Anthony – Set I



17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
717-731-1970 Main
717-731-1985 Main Fax
www.postschell.com

Devin Ryan

dryan@postschell.com
717-612-6052 Direct
717-731-1985 Direct Fax
File #: 167945

June 6, 2018

VIA E-MAIL & REGULAR MAIL

Kathleen R. Anthony
505 Norway Place
Bethlehem, PA 18015-4435

Re: Kathleen R. Anthony v. PPL Electric Utilities Corporation
Docket No. C-2018-3000490

Dear Ms. Anthony:

Enclosed are the Interrogatories and Requests for Production of Documents Propounded by PPL Electric Utilities Corporation on Kathleen R. Anthony – Set I in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Please provide answers to the enclosed discovery within twenty (20) days of the date of service, pursuant to 52 Pa. Code § 5.342.

Sincerely,

Devin Ryan

DTR/jl
Enclosures

cc: Rosemary Chiavetta, Secretary (*Letter & Certificate of Service Only*)
Certificate of Service

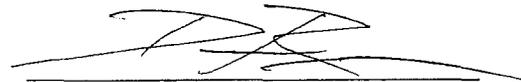
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA EMAIL & FIRST CLASS MAIL

Kathleen R. Anthony
505 Norway Place
Bethlehem, PA 18015-4435
Kranthony7@gmail.com

Date: June 6, 2018



Devin T. Ryan

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Kathleen R. Anthony,	:	
	:	
Complainant	:	
	:	
v.	:	Docket No. C-2018-3000490
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent	:	

**INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED BY
PPL ELECTRIC UTILITIES CORPORATION ON
KATHLEEN R. ANTHONY – SET I**

Pursuant to 66 Pa.C.S. § 333 and 52 Pa. Code §§ 5.341 *et seq.*, PPL Electric Utilities Corporation (“PPL Electric”) propounds the following Interrogatories and Requests for Production of Documents (hereinafter, “discovery requests”) on Kathleen R. Anthony (“Complainant”) – Set I.

INSTRUCTIONS AND DEFINITIONS

1. The “Responding Party,” “you,” or “your” means the party to which these discovery requests are propounded and/or all attorneys, agents, affiliates, subsidiaries, employees, consultants, members, constituents, and representatives acting on behalf of the Responding Party.
2. “Commission” means the Pennsylvania Public Utility Commission.
3. To “identify” a natural person means to state that person’s full name, title or position, employer, last known address, and last known telephone number.

4. To “identify” a business entity means to state the full name of such business, the form of the business, and its location or address.

5. To “identify” a “document” means to provide all of the following information irrespective of whether the document is deemed privileged or subject to any claim of privilege:

- a. The title or other means of identification of each such document;
- b. The date of each such document;
- c. The author, preparer or signer of each such document; and
- d. A description of the subject matter of such document sufficient to permit an understanding of its contents and importance to the testimony or position being examined and the present or last known location of the document. The specific nature of the document should also be stated (*e.g.*, letter, business record, memorandum, computer print-out, etc.).

In lieu of “identifying” any document, it shall be deemed a sufficient compliance with these discovery requests to attach a copy of each such document to the answers hereto and reference said document in the particular interrogatory to which the document is responsive.

6. “Document” means the original and all drafts of all written and graphic matter, however produced or reproduced, of any kind or description, whether or not sent or received, and all copies thereof which are different in any way from the original (whether by interlineation, date-stamp, notarization, indication of copies sent or received, or otherwise), including without limitation, any paper, book, account, photograph, blueprint, drawing, sketch, schematic, agreement, contract, memorandum, press release, circular, advertising material, correspondence, letter, telegram, telex, object, report, opinion, investigation, record, transcript, hearing, meeting, study, notation, working paper, summary, intra-office communication, diary, chart, minutes, index sheet, computer software, computer-generated records or files, however stored, check, check stub, delivery ticket, bill of lading, invoice, record or recording or summary of any telephone or other conversation, or of any interview or of any conference, or

any other written, recorded, transcribed, punched, taped, filmed, or graphic matter of which the Responding Party has or has had possession, custody or control, or of which the Responding Party has knowledge.

7. "Communication" means any manner or form of information or message transmission, however produced or reproduced, whether as a document as herein defined, or orally or otherwise, which is made, distributed, or circulated between or among persons, or data storage or processing units.

8. "Date" means the exact day, month, and year, if ascertainable, or if not, the best approximation thereof.

9. Items referred to in the singular include those in the plural, and items referred to in the plural include those in the singular.

10. Items referred to in the masculine include those in the feminine, and items referred to in the feminine include those in the masculine.

11. The answers provided to these discovery requests should first restate the question asked and identify the person(s) supplying the information.

12. In answering these discovery requests, the Responding Party is requested to furnish all information that is available to the Responding Party, including information in the possession of the Responding Party's attorneys, agents, consultants, or investigators, and not merely such information of the Responding Party's own knowledge. If any of the discovery requests cannot be answered in full after exercising due diligence to secure the requested information, please so state and answer to the extent possible, specifying the Responding Party's inability to answer the remainder, and stating whatever information the Responding

Party has concerning the unanswered portions. If the Responding Party's answer is qualified in any particular, please set forth the details of such qualification.

13. If the Responding Party objects to providing any document requested on any ground, identify such document by describing it as set forth in Instruction 5 and state the basis of the objection.

14. If the Responding Party objects to part of a discovery request and refuses to answer that part, state the Responding Party's objection and answer the remaining portion of that discovery request. If the Responding Party objects to the scope or time period of a discovery request and refuses to answer for that scope or time period, state the Responding Party's objection and answer the discovery request for the scope or time period that the Responding Party believes is appropriate.

15. If, in connection with a discovery request, the Responding Party contends that any information, otherwise subject to discovery, is covered by either the attorney-client privilege, the so-called "attorneys' work product doctrine," or any other privilege or doctrine, then specify the general subject matter of the information and the basis to support each such objection.

16. If any information is withheld on grounds of privilege or other protection from disclosure, provide the following information: (a) every person to whom such information has been communicated and from whom such information was learned; (b) the nature and subject matter of the information; and (c) the basis on which the privilege or other protection from disclosure is claimed.

17. As set forth in 52 Pa. Code § 5.342(g), these discovery requests are continuing, and the Responding Party is obliged to change, supplement, and correct all answers given to conform to new or changing information.

18. "Formal Complaint" means the Formal Complaint filed by the Complainant at Docket No. C-2018-3000490.

**INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED ON
KATHLEEN R. ANTHONY – SET I**

PPL to Complainant-I-1

Re: Formal Complaint.

- (a) Please explain in detail the reasons why you are challenging the Company's installation of the new smart meter.
- (b) Please describe in detail all health concerns, if any, raised by the Company's new smart meter, state the bases for such claims, and provide all documents relied upon by you in your response.
- (c) Please describe in detail all safety concerns, if any, raised by the Company's new smart meter, state the bases for such claims, and provide all documents relied upon by you in your response.
- (d) Please describe in detail all privacy concerns, if any, raised by the Company's new smart meter, state the bases for such claims, and provide all documents relied upon by you in your response.
- (e) Please describe in detail all reasons you believe the Company's new smart meter violates the law.

PPL to Complainant-I-2

Please identify all wireless phones, cellphones, microwaves, wireless routers, wifi networks, tablets, computers, Bluetooth speakers, wireless security systems, smart speakers (e.g., Amazon Echo), garage door openers, baby monitors, and walkie talkies that are contained in or used in the house.

PPL to Complainant-I-3

Please state whether you or any member of your household uses a cell phone. If so, please provide the make and model of each cell phone and, for each phone identified, provide 12 months of phone bills or other records of actual cell phone usage.

PPL to Complainant-I-4

- (a) Please state every health condition you claim was caused by a smart meter or will be caused or worsened by the installation of PPL Electric's new smart meter.
- (b) Please provide the date that every health condition identified in subpart (a) began.

- (c) Please provide copies of all your medical records of every health condition identified in subpart (a).
- (d) For each alleged health condition that you do not have medical records for in response to subpart (c), please state whether such condition was diagnosed by a medical professional. If so, please provide the name, address, and telephone number of the medical professional and the date of the diagnosis.
- (e) For each of the alleged health conditions identified in subpart (a), please state whether you have been prescribed any therapy or treatment for the condition by a medical professional. If so, please identify the therapy or treatment, provide the name, address, and telephone number of the prescribing medical professional, and provide the date the therapy or treatment was prescribed.

PPL to Complainant-I-5

Please identify each person you plan to call as a fact witness in this proceeding. For each person, please:

- (a) Provide the person's name, home and business address, background, and qualifications;
- (b) Explain in detail the subject matter(s) on which the witness is expected to testify; and
- (c) Provide the source(s) of information relied upon or referenced by the witness.

PPL to Complainant-I-6

Please identify each person you plan to call as an expert witness in this proceeding. For each person, please:

- (a) Provide the person's name, home and business address, background, and qualifications;
- (b) Explain in detail the subject matter(s) on which the witness is expected to testify;
- (c) Provide the source(s) of information relied upon or referenced by the witness; and
- (d) Provide a copy of the expert witness's current curriculum vitae.

PPL to Complainant-I-7

Please provide copies of all exhibits you intend to present or utilize at the evidentiary hearing in this proceeding. For each exhibit to be used as part of your direct case, please identify the witness who will be sponsoring the exhibit.

APPENDIX B

Objections of Kathleen R. Anthony to the Interrogatories and Requests for Production of Documents Propounded by PPL Electric Utilities Corporation – Set I

PENNSYLVANIA PUBLIC UTILITY COMMISSION

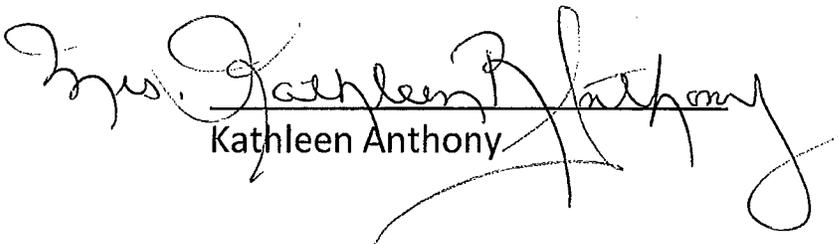
Kathleen Anthony :
:
Complainant :
v. : **Docket No. C-2018-3000490**
:
PPL Electric Utilities Corporation :
:
Respondent :

CERTIFICATE OF SERVICE

I, Kathleen Anthony, hereby certify that I have this day sent via USPS Certified Mail/Next Day Delivery my Objections to the Interrogatories propounded upon me by PPL Electric Utilities Corporation, Set I.

Devin Ryan, Esquire
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101

Date: June 14, 2018


Kathleen Anthony

June 14, 2018

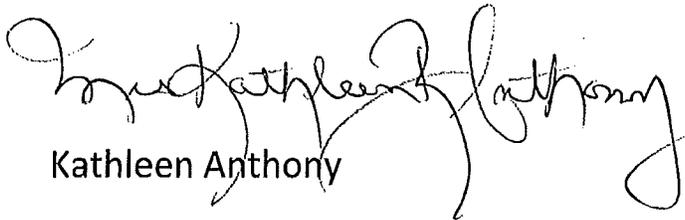
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone building
400 North Street, 2nd Floor
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Kathleen Anthony v. PPL Electric Utilities Corporation
Docket No. C-2018-3000490

Dear Secretary Chiavetta:

Enclosed for filing are my Objections to the Interrogatories, Set I, propounded upon me by PPL Electric Utilities Corporation, in the above referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Kathleen Anthony

Enclosures

Cc: ALJ Elizabeth Barnes
Certificate of Service

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Kathleen Anthony :
 :
 Complainant :
 v. : **Docket No. C-2018-3000490**
 :
 PPL Electric Utilities Corporation :
 :
 Respondent :

Objections to PPL Interrogatories, Set I

Kathleen Anthony to Respondent

Complainant to PPL -1-2

Object to this request. It is overly burdensome and broad. It is not meant to illicit any relevant or significant testimony.

Complainant to PPL – 1-3

Object to this request. Again, it is overly burdensome and broad. It is not meant to illicit any relevant or significant testimony.

AFFIDAVIT

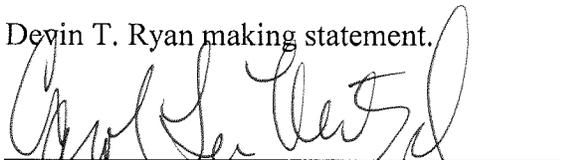
COMMONWEALTH OF PENNSYLVANIA)
)
COUNTY OF DAUPHIN) SS:

DEVIN T. RYAN, being duly sworn according to law, deposes and states that he is Counsel to PPL Electric Utilities Corporation and that in this capacity, he is authorized to and does make this affidavit for them, and that the facts set forth in the foregoing Answer are true and correct to the best of his knowledge, information and belief.


Devin T. Ryan, Esquire

Signed and sworn to before me on

June 25, 2018, by

Devin T. Ryan making statement.

Notary Public

My commission expires _____.

(SEAL)

