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JUN 27 2018

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

331 Shady Ridge Drive  
Monroeville, PA 15146

June 27, 2018

*Via Paper Filing*

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, Pennsylvania 17120

RE: **Michele Hriadil and Francis Hriadil v. Duquesne Light Company**  
Docket No. C-2016-2571726  
**Request to Extend the Response Deadline for Respondent's Motion for Summary Judgment until July 6**

Dear Secretary Chiavetta:

Attached please find a copy of Complainants

Request to Extend the Response Deadline for  
Respondent's Motion for Summary Judgment until July 6

A copy of this document has been served upon Judge Jeffrey Watson, the presiding PA PUC ALJ, and the Respondent's Counsel, Jeremy V Farrell, Esquire, in accordance with Commission regulations.

Please feel free to contact me if you have any questions.

Sincerely,



Francis Hriadil  
Complainant  
(412) 779-3314  
hriadil@attglobal.net

Enclosure

331 Shady Ridge Drive  
Monroeville, PA 15146

June 27, 2018

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Judge Jeffrey Watson  
PA PUC Pittsburgh Administrative Law Judge Office  
301 Fifth Ave, Suite 220; Piatt Place  
Pittsburgh, PA 15222

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**RE: Michele Hriadil and Francis Hriadil v. Duquesne Light Company**  
**Docket No. C-2016-2571726**  
**Request to Extend the Response Deadline for Respondent's Motion for Summary Judgment until July 6.**

**Cc: Jeremy V Farrell, Esquire, Counsel for Duquesne Light Company**

**Cc: Rosemary Chiavetta, Secretary, Pennsylvania Public Utility Commission**

Dear Judge Watson:

I am engaged in our effort to respond to the Respondent Duquesne Light's extensive and involved Motion for Summary Judgment. In that document the Respondent included over 26 legal case citations, with references to additional cases, not listed in their table of citations page.

It is taking me somewhat longer to research these citations and cases than I originally estimated, as I am the only person able to research and process all of this material.

Looking at the remaining time Complainants have, which is June 30, it does not look like I will be able to complete this task, formulate, and serve our complete response by that date. As such, **Complainants respectfully request that we be granted a few more days until Friday, July 6 to provide our response.**

Complainants contacted the Respondent first thing this morning to inform them of this circumstance and ask for their concurrence, as we did not wish to spring this on anyone at the last minute.

Complainants communication with them and their response is attached. Summarizing Attorney Farrell's response, the Respondent has expressed no inherent objection; but did express concern with the Hearing schedule, which still lists Hearing dates of July 18 -19, as Your Honor has yet to rule on Complainants May 18, 2018 "Motion for Continuance to Enable Complainants Expert Witness to Participate in Our Hearing and ...".

Complainants filed that formal request per You Honor's May 10, 2018 "Interim Order Regarding Complainants' Request to Modify Litigation Schedule," which we received on May 14." Complainants filed our motion a few days later on May 18, well before Your Honor's deadline of May 30. Two (2) weeks later, on June 4, 2018, Complainants received a copy of Respondent's June 1 Answer to Motion for Continuance to Enable Complainants Expert Witness to Participate in Hearing and..." in which the Respondent indicated "Duquesne Light does not object to Complainant's request to continue the hearing dates..." However, in their

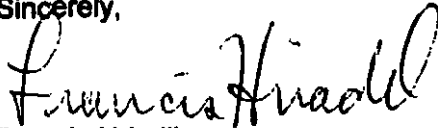
Answer, the Respondent requested that the issuance of any new litigation schedule be held in abeyance pending the resolution of their impending dispositive motion for summary judgment.

In Complainants June 6 Response to Respondent's June 1 Answer, we expressed concern with potential problems and uncertainty that such an abeyance could cause. And, it appears that Complainants concerns were well-founded.

As Duquesne Light has already indicated in its June 1 Answer that it has no inherent objection to a continuance and adjustment of the Litigation Schedule, and as its only reservation concerning the granting of a few more days until July 6 for the Complainants to respond to its extensive Motion for Summary Judgment is tied to the Hearing dates of July 18-19, **Complainants respectfully request that Your Honor rule that the Hearing is continued with the new dates yet to be determined by Your Honor, and that the Complainants be granted a few more days until July 6 to respond.**

Complainant's Certificate of Service has been filed with the Commission's Secretary, in accordance with Commission Regulations.

Sincerely,



Francis Hriadil  
Complainant  
(412) 779-3314,  
[hriadil@attglobal.net](mailto:hriadil@attglobal.net)

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SECRETARY'S BUREAU

Attachment:

June 27 email communication with Respondent's attorney, Jeremy Farrell.

ATTACHMENT

From: "Farrell, Jeremy" <jfarrell@tuckerlaw.com>  
To: "'hriadil'" <hriadil@attglobal.net>  
Cc: "Miller, Shane" <smiller@tuckerlaw.com>  
Date: 06/27/2018 09:18  
Subject: RE: Concerning Your Motion for Summary Judgment

Mr. Hriadil:

Thank you for contacting me in advance. Unfortunately, we cannot agree to your request at this time. The hearing remains scheduled for July 18 and the extension you request would bring us very close to that date. I believe that leaves too little time for ALJ Watson to review our motion for summary judgment and your opposition to it and prepare an opinion on the subject.

If ALJ Watson does grant your request for continuance in a way that alleviates our concerns about the timing, we would certainly reconsider our position.

Jeremy V. Farrell, Esq.  
Tucker Arensberg, P.C.  
Direct Dial: (412) 594-3938

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SECRETARY'S BUREAU

-----Original Message-----

From: hriadil <hriadil@attglobal.net>  
To: "Farrell, Jeremy" <jfarrell@tuckerlaw.com>  
Date: 06/27/2018 08:56  
Subject: Concerning Your Motion for Summary Judgment

Att Farrell.

I am continuing with our effort to respond to your comprehensive Motion for Summary Judgment.

You have included over 26 legal case citations, with references to additional cases, not listed on your table of citations page.

It is taking me somewhat longer to research these citations and cases than I originally estimated, as I am the only person able to research and process all of this material.

Looking at the remaining time I have, which is June 30, it does not look like I will be able to complete this task, formulate, and serve our complete response by that date.

I do not want to wait until the last minute and spring this on anyone.

Would you object to granting me a few more days to allow me to complete our response?

I am asking that you do not object to me requesting a new deadline of Friday, July 6.

I can assure you that I do not request extensions lightly, and that it is not some tactic on my part.

I would appreciate your consideration here, and hope with we can continue with the considerations we have afforded each other when situations like this have arisen in the past.

Sincerely,  
Francis Hriadil.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Michele Hriadil and  
Francis Hriadil,

Complainant,

vs.

DUQUESNE LIGHT COMPANY,

Respondent.

No: C-2016-2571726

**CERTIFICATE OF SERVICE**

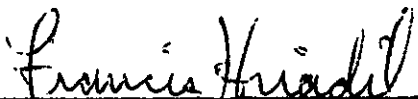
I hereby certify that I have this day served a true copy of the foregoing document upon the participant listed below in accordance with the requirements of 52 PA. Code § 1.54 (relating to service by a participant):

*Via Paper Filing*  
Judge Jeffrey Watson  
PA PUC Pittsburgh Administrative Law Judge Office  
301 Fifth Ave, Suite 220  
Piatt Place  
Pittsburgh, PA 15222

*Via Paper Filing*  
Jeremy V Farrell, Esquire  
Paul S Miller, Esquire  
1500 One PPG Place  
Pittsburgh, PA 15222  
(412) 594-5619 (Fax)

Counsels for Respondent, Duquesne Light Company

Dated this 27<sup>th</sup> day of June 2018



Michele and Francis Hriadil  
331 Shady Ridge Drive  
Monroeville, PA 15146

(412) 779-3314  
[hriadil@attglobal.net](mailto:hriadil@attglobal.net)

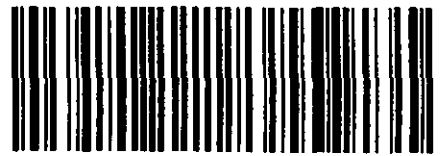
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F. Hriadil  
331 Shady Ridge Drive  
Monroeville, PA 15146

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**Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, Pennsylvania 17120**

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