

PITTSBURGH, PA 15234

AUG. 2  
~~July~~ 2018

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SECRETARY'S BUREAU

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utilities Commission  
P.O. Bo 3265  
Harrisburg, PA 17105-3265

**RE: Amended Complaint Against Pennsylvania Water and Sewer Authority ["PWSA"]  
Docket No. C-2018-3000961**

Dear Ms. Chiavetta:

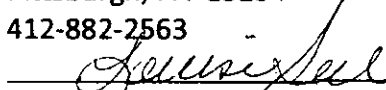
Please accept for filing the attached Objection to PWSA's Motion for Interim Scheduling Order in the above referenced matter.

Thank you for your attention to this matter.

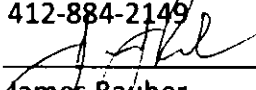
Yours truly,



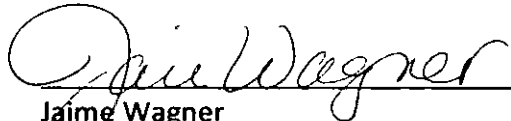
Natalie Leon  
2805 Homehurst Ave.  
Pittsburgh, PA 15234  
412-882-2563



Louise Sell  
2913 Homehurst Ave.  
Pittsburgh, PA 15234  
412-884-2149



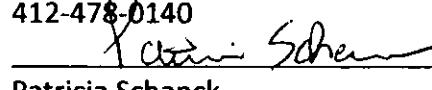
James Rauber  
1801 Byrnick Dr.  
Pittsburgh, PA 15243  
412-279-0484



Jaime Wagner  
2901 Homehurst Ave.  
Pittsburgh, PA 15234  
412-531-0672



Christopher Cratsley  
2915 Homehurst Ave.  
Pittsburgh, PA 15234  
412-478-0140



Patricia Schanck  
2807 Homehurst Ave.  
Pittsburgh, PA 15234  
412-881-5413

Cc: Certificate of Service [w/enc.]

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BEFORE THE PENNSYLVANIA PUBLIC UTILITIES COMMISSION

Natalie Leon, Jaime Wagner, Louise Sell,  
Christopher Cratsley, James Rauber and  
Patricia Schanck  
v.

Doc. No. C-2018-3000961

Pennsylvania Water and Sewer Authority  
("PWSA")

**OPPOSITION TO PWSA'S MOTION FOR AN INTERIM ORDER**

Complainants in this matter oppose PWSA's Motion for an Interim for the reason that it is premature. In support thereof, Complainants state as follows:

1. Act 65 of 2017 requires PWSA to submit to the Commission for its approval a new tariff and long-term compliance plan for among other things, repair, improvement and replacement of aging infrastructure and how it will be handled. This has not yet been accomplished, and the decision of the Commission could have a direct bearing on this litigation.
2. PWSA seeks to preclude these parties from exercising their right to amend pleadings under 52 PA Code 5.91. *Pro se* litigants are not professionals and are generally entitled to have their pleadings liberally construed by the courts. Courts are actually counseled to liberally construe *pro se* pleadings.<sup>1</sup> Not only professional, but non-professionals, too, have the right to amend and correct their documents within the time parameters for such amendments.

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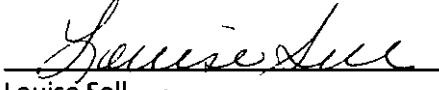
<sup>1</sup> *Thomas v. Norris*, 2006 WL 25 90488 \*4 (M.D. Pa. 2006)

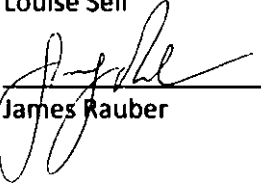
3. Although counsel for PWSA has criticized the content of amended pleadings that have been filed, PWSA's counsel has editorialized in each of their pleadings by, for example, using lengthy introductions on Answers rather than addressing only the actual allegations in the complaint they are responding to and are generally ignoring general protocol.
4. PWSA has in no way tried to be "economical" as it has already spent thousands of dollars on attorney fees disputing a \$5,000.00 fix on the sewer line which is the subject of the action. Three different groups of attorneys are involved in this matter, and appeals they take are very costly.
5. Mr. Rauber, a party to the action, has encountered a medical problem and is in the process of obtaining legal counsel.
6. Two days ago, additional information regarding a property on the sewer line in question was discovered by these complainants, and this will also have a direct bearing on the outcome of this case.
7. Counsel for PWSA has not done any due diligence as they are not even familiar with the actual properties in question.


WHEREFORE, complainants pray that the Commission, having primary jurisdiction, will deny PWSA's Motion, and for such other and further relief as it deems just and proper

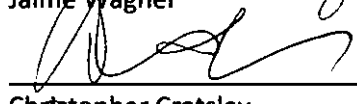
Respectfully submitted,

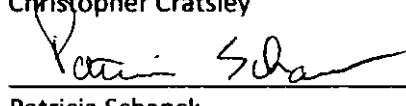
  
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Natalie Leon

  
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Patricia Schanck

Dated: 8/2/18

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BEFORE THE PENNSYLVANIA PUBLIC UTILITIES COMMISSION

Natalie Leon, Jaime Wagner, Louise Sell,  
Christopher Cratsley, and James Rauber

v.

Doc. No. C-2018-3000961

Pennsylvania Water and Sewer Authority  
("PWSA")

CERTIFICATE OF SERVICE

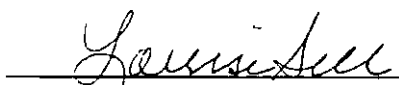
I hereby certify that on 8/2/18 we served a copy of the foregoing document by first-class mail upon the persons listed below:

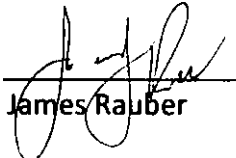
Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265


Daniel Clearfield, Esquire  
Carl R. Shultz, Esquire  
Eckert Semans Cherin & Mellott, LLC  
213 Market Street  
Harrisburg, PA 17101

Honorable Mark A. Hoyer  
Office of Administrative Law Judge  
PA Public Utility Commission  
301 5<sup>th</sup> Avenue, Suite 220  
Pittsburgh, PA 15222

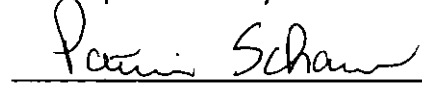
  
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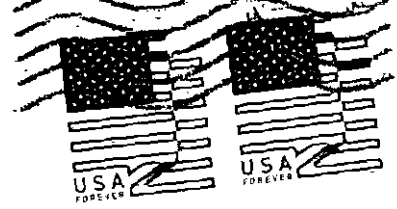
  
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Patricia Schanck

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PITTSBURGH PA 150

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ROSEMARY CHIAVETTA, SECY  
PA P.U.C.

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HARRISBURG, PA 17105-3265

17105-326565

