

Willard and Elsbeth Sunstein
860 Cupola Road
Honey Brook, PA 19344

May 10, 2018

VIA ELECTRONIC FILING

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

Regarding:

Willard and Elsbeth Sunstein v. PPL Electric Utilities Corporation C-2018-3000078

In Actuality contrasting with the above imposed formality :

Willard and Elsbeth Sunstein seeking Win-Win with PPL C-2018-3000078

Dear Secretary Chiavetta:

Herewith for filing are our Motions Gently, but Firmly Appealing for Justice, including

1. Motion for Extension
2. Motion for adjusting the schedule to enable justice to be served instead of form over substance to hinder justice with impossible deadlines.

We certify here that we are serving copies of this complete filing via email to Judge Elizabeth Barnes and PPL attorneys Ryan, Hirakis and Lent.

This filing is to be posted publicly; please see note regarding non-confidentiality of this filing page 4

Thank you for your help in this filing,

Sincerely,

Willard Sunstein *Elsbeth Sunstein*
Willard and Elsbeth Sunstein 30 August 2018

cc complete with all enclosures including attachments, via email:
Judge Elizabeth Barnes and Attorney Devin Ryan, Attorney Hirakis, Attorney Lent

CERTIFICATE OF SERVICE

In light of an horrific nit-picky legalese email from Secretary Chiavetta rejecting our pro se filing because she did not accept our very clear certifying of service on page 1 as a certificate of service, we include this separate page for certificate of service.

We understand accepting eservice is standard courtesy among lawyers.

We note that after all the hanky panky from attorney Ryan denying acceptance of eservice from us because he did not have permission from PPL to accept it, he finally has deigned to accept eservice from us after we sent him a list of attorneys accepting eservice from PPL and we asked Ryan which of them we should eserve on our case.

We are thankful that Ryan has acquiesced to offering us this so we are not once again forced to drive to and from the post office today, like we had to do earlier with our last filing through the solidarity of stance taken together by Rosemary Chiavetta, Secretary of the PA PUC and Devin Ryan attorney for PPL.

We hereby certify that a true and correct copy of the foregoing is being served and will have been served today (before or a few minutes after doing our efilings with the PA PUC) 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)

we eserving via email: Judge Elizabeth Barnes and
the following attorneys for PPL : Attorney Devin Ryan, Attorney Hirakis, Attorney Lent

Dated August 30th, 2018, in Honeybrook, PA for both of us:

Willard Sunstein Elsbeth Sunstein

Willard Sunstein and Elsbeth Sunstein

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Willard and Elsbeth Sunstein :
v. : C-2018-3000078
PPL Electric Utilities Corporation :

**In Actuality contrasting with the above imposed formality of us v. them:
Willard and Elsbeth Sunstein seeking Win-Win with PPL C-2018-3000078**

NOTICE TO PLEAD

Pursuant to 52 Pa. Code Section 5.61, you are hereby notified that if you do not file a written response denying or correcting the enclosed Motion filed by Willard and Elsbeth Sunstein within 20 days from the service of this notice, a decision may be rendered against you. All pleadings, such as a Reply to Motion, must be filed with the Secretary of the Pennsylvania Utility Commission, with a copy served to Willard and Elsbeth Sunstein, and where applicable, the Administrative Law Judge presiding over the issue.

File with:
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, Pennsylvania 17120

with the courtesy of requested eservice to the email address for us which you have on file and with a copy to:

Willard and Elsbeth Sunstein
860 Cupola Road
Honeybrook, PA 19344

Dated 30th August, 2018, in Honeybrook, PA



Willard Sunstein



Elsbeth Sunstein

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Willard and Elsbeth Sunstein	:	
v.	:	C-2018-3000078
PPL Electric Utilities Corporation	:	

Combined:

Motion for extension

and

Motion to significantly adjust schedule of 3rd Interim Order of Judge Elizabeth Barnes dated on 8th of August 2018 (perhaps filed only the next day)

**In Actuality contrasting with the above imposed formality of us v. them:
Willard and Elsbeth Sunstein seeking Win-Win with PPL C-2018-3000078**

Efiled Date: August 30th , 2018

Willard and Elsbeth Sunstein herein referred to as “we”, “us”, “our”
PPL Electric Utilities Corporation herein referred to as “PPL”

We are filing this ourselves without a lawyer, that is, pro se.

We are today filing these two Motions with the PA PUC on August 30th 2018, and we are filing these with the Secretary of the PA PUC with a copy to PPL lawyer Devin Ryan via email pursuant to 52 PA Code Section 5.61

Willard and Elsbeth Sunstein
Gently yet Firmly Appealing for JUSTICE

In connection with the present untenable schedule of the 3rd Interim Order of Judge
Elizabeth Barnes

TO ADMINISTRATIVE LAW JUDGE ELIZABETH H. BARNES:

This is a public document efiled at the PA PUC. To help ensure wholesome understanding in the public's interest, we hereby request each and all who might wish to quote from this document to give with their quote full access to this document in its entirety.

The expression of truth is context dependent. $10 + 10 = 20$ in the context of base 10, but mathematicians know that in the context of base 2, $10 + 10 = 100$. The context here is far more nuanced than arithmetic, thus our request to have the context of all quotes honored.

We appreciate that Your Honor has filed a protective order in our case for confidential medical information; we feel that our medical information we talk about in this efiled is extremely minimal and serves to illustrate the need to grant our requests, not only for our benefit, but for the benefit of all medically vulnerable Pennsylvania residents who suffer from EHS and/or other medical issues. That is the reason we expressly wish only this document containing minimal medical information about us, to be posted on the PA PUC website under our case number.

Table of Contents

Dedication in Memory of the late Susan Kreider to all who are suffering from EHS
Page 7

To Judge Elizabeth Barnes
Page 12

Motions 1 and 2
Page 13

Exhibit Number 1
Recent Email correspondence with Judge Elizabeth Barnes in so far as she was able to
and deigned to correspond.
Page 15

Exhibit Number 2
Email correspondence with Judge Elizabeth Barnes immediately prior to prehearing
conference of 10 July 2018 :
Page 35

Dedication in Memory of Susan Kreider to all who are suffering from EHS

Because of its fundamental importance for understanding the real human context of this entire legal proceeding, we are moved here to include as an ongoing dedication what we wrote previously:

We are not lawyers. This legal situation imposed upon us by PPL turning away from all conversation we hoped for to seek win-win solutions together, is not a conventional situation for us. In the interest of bringing as much true humanness into these so very mechanical legal necessities imposed upon us, we cannot write conventional legal briefs. We exercise essential artistic license to honestly express the whole reality that needs addressing here legally. In our writings we seek to bear witness to the full truth of life, not compose for us disgustingly desiccated discourse void of humanity.

The PA PUC, clearly under a carefully hidden influence it has not disclosed to the public, has chosen to irregularly interpret PA Act 129 for the utilities against all interests of consumers as a no opt- out, universally mandatory Act. Please see in our filing of May 10th 2018 Exhibit 1 Legislative History of PA Act 129, herein justifying this assertion.

The suffering that has resulted from this ongoing travesty of justice is just beginning to surface. To the best of our knowledge, the late Susan Kreider is the first most unfortunate canary in the critically dangerous coal mine the PA PUC and utilities have chosen to make of the entire state of Pennsylvania.

In deep empathy for the late Susan Kreider and her suffering from injustice in the face of treatment by Peco and the PA PUC, we dedicate this legal filing of our motions for justice to her.

Susan was a nurse who became incapacitated with Guillain-Barre Syndrome from a vaccine her career practice required at that time. With her ailing nervous system, she thus became also very electromagnetic hypersensitive, EHS.

When a smart meter was installed on her home, she had to go through an enormous struggle every night up the stairs to the farthest corner of her house to try and reduce the effects she suffered from the smart meter. However, her health continued to deteriorate until, in total desperation, she had someone replace her smart meter with an analog meter. At this point her health began to turn around. A friend encouraged her to file a formal complaint pro se to keep Peco from carrying through their threats to turn off her electric and/or put a smart meter back on. Mild mannered, incapacitated, Susan was evidently a horrific menace to the multi-billion dollar tyrannosaurus rex going under the name of Peco Energy Company, so they put a pack of eleven snarling lawyers on Susan's

case doing their very best to make sure Susan would not get a hearing, not get her day in court. But for a series of two amicus briefs filed and paid for by her friend, Susan would not have had a hearing at all. On the basis of these two briefs, seeing a lawyer involved on the sidelines, the PA PUC, facing this mounting call for justice, was moved to permit Susan's hearing and even others whose cases had been earlier dismissed by PA PUC judges.

Susan's hearing led, under the circumstances to somewhat mixed but ultimately unfortunate results against Susan, who could not afford a lawyer nor expert witnesses nor the personal energies to pursue her case effectively. She was simply bulldozed over by the bold face lies from the "expert" witnesses, read "shills", for Peco. As someone incapacitated by Guillain-Barre Syndrome, under all the enormous stress from this, her health and balance were affected and Susan had one of her worst fears happen. She slipped and fell, requiring hospitalization. She dreaded this, because in her practice as a nurse, when she became EHS she had come to know that hospitals were filled with very high electromagnetic fields that she could no longer tolerate. She had warned other EHS sufferers about this problem. In the hospital which had no accommodation for EHS patients, her blood pressure soared from the radiation, and her blood brain barrier was weakened when she suffered from a stroke. Cascading events and a second stroke led ultimately to life support systems. In the end, family members, faced with this heart rending situation, finally made the very difficult decision to stop the artificial life support systems and Susan passed on.

The horrific stress she was under from Peco's actions was clearly not a concern of the Peco T. Rex, which has plenty of money for all expenses so essential to feed packs of lawyers to intimidate customers like Susan and make an example of them, so no one else will dare speak up, ever. Not only does Peco T. Rex have plenty of money for intimidation tactics, it can pass on all expenses for intimidation as business necessities intrinsic to every heartless beast, pass these expenses on to all of its customers. Further still, because it is such a wonderful monopoly totally devoted to serving the public with an essential service, it is granted the right to make a profit on its so essential expenses for harassment and intimidation of disabled customers, like Susan. And surely Peco Rex wants to make as much profit as it can, it is obligated to do so for its investors, which include surely many pension funds for ordinary working people. Perhaps too, some of the executives who made the decisions to unleash the heartless lawyer horde upon Susan might have bonuses or options for which profits might come into consideration.

Is it too much to ask if something could be improved in how this is all arranged and done?

We remember Susan, dedicate this filing for justice to her, and wish others would have empathy for her and other vulnerable individuals and seek ways to amend society to lessen the likelihood of such travesties escalating.

We are aware of others brought literally to stand as we write this on the brink of extinction with extreme ailments created and/or enormously exacerbated by similar actions of utilities in collusion with the PA PUC. We hope and pray that in future filings till our case be resolved, we will not have to add others to a list beginning with Susan. One in PA driven right over the brink is more than enough already.

We enjoin all to recognize that the American with Disabilities Act also protects people who are sensitive to electromagnetic pollution. See this link of the United States Access Board:

<https://www.access-board.gov/research/completed-research/indoor-environmental-quality/recommendations-for-accommodations> We quote from the link:

“According to the Americans with Disabilities Act (ADA) and other disability laws, public and commercial buildings are required to provide reasonable accommodations for those disabled by chemical and/or electromagnetic sensitivities. These accommodations are best achieved on a case-by-case basis. Reasonable accommodations for a chemically sensitive and/or electromagnetically sensitive individual can include providing a space or meeting area that addresses one or more of the Cleaner Air criteria, upon request, such as

.....

Require cell phones and computers be turned off

Provide incandescent lighting in lieu of fluorescent lighting

.....”

Yes, the PA PUC is required to provide the public with access to its buildings in such a way that if necessary on a case by case basis, they must provide a meeting area free of cell phones and fluorescent lighting, but the PA PUC and the utilities think they can blast vulnerable people, no exceptions allowed, with transmissions from a smart meter pulsing with peak levels enormously higher than any cellphone, day and night in their houses and bedrooms and on their streets, which are public places where they need access too.

The PA PUC and utilities in PA are not just conspiring to keep sensitive people from having safe access to their own homes and streets where they live, they are colluding to keep everyone from waking up to an understanding what is causing a number of and perhaps a great many of their ailments. The control they are feverishly working to exercise against acknowledging the growing body of peer reviewed scientific literature

showing damage from thermally insignificant “low level” electromagnetic radiation is at the spiritual root of a massively destructive deception with no feeling, for those who have been hit by it, like a war upon vulnerable humanity. Because the PA utilities have been unsuccessful in their massive attacks to prevent any hearings from happening in the first place, they have dug up from the swamp an “expert” who habitually lies in court under oath about the exact specifications of the radiation from the meter “smarts”. And they have conjoined with this morally degenerate monstrosity another “expert” who based on the lies of the first says medical harm is impossible. Knowing the truth is hard to knock out, and has the so terribly nasty tendency to resurrect again and again, the PA utilities have their attack beasts feverishly snarling, clawing, and biting in desperation to try and prevent those harmed from being permitted to have experts testify on their behalf in those cases where they somehow manage to gather the inner and outer resources to try do so.

The importance of knowing the truth is illustrated by an independently funded scientific study in Japan, published in a peer reviewed journal. Please see in our filing of May 10, 2018, Exhibit 2 Health of Residents Improved with Antennae Removal. In this study, 107 condo residents were examined before and after removal of cell phone masts. Before removal, 49 of them suffered from various health problems including fatigue and loss of motivation, eye pain, deteriorated eyesight, insomnia, sleep problems, sleep disturbances, dizziness, jitteriness, tachycardia, palpitation, numbness, hypertension and other issues. However, 3 months after removal of the antennae, only 25 had health issues. We note that the official measurements made by the antennae company were significantly below what PA utility companies claim their smart meters radiate. They also were not believed to be honest measurements by the authors of the study. We also note that the measurements in the field by independent electrical engineer expert witnesses have been greater than what PA utilities claim their smart meters emit. There seems to be a pattern here.

If someone develops a health issue a few months after installation of a smart meter, how are they to find out if the smart meter is part of the problem when they are uninformed?

Shouldn't the PA PUC and the utilities warn people just like cigarette manufacturers are required to do?

Before there was an awareness of illness caused by intolerance to peanuts or gluten, a great many suffered needlessly because they had no idea where their suffering was from. Now, to enable informed decisions and to understand what might be causing problems or not, it is standard for foods to be labeled if they have been processed in facilities that handle nuts or peanuts that are not technically nuts.

We need awareness of possible problem sources if we are ever going to solve the problems.

In memory of Susan, we add here one more quick set of references of links from a single website showing she was in no way alone with EHS.”

Note here please, the mounting anecdotal evidence of issues the PA PUC and utilities need to give consideration. Here is a personal story of Jeromy Johnson, an engineer from silicon valley, who developed EHS when a smart meter was attached to his home.

<https://www.emfanalysis.com/about/>

Here, Jeromy has references to some others, from the owner of a billion dollar company, to a former Chief Technology Officer at Nokia and more who suffer from EHS

<https://www.emfanalysis.com/emf-refugee/>

However, this is not just a matter of anecdotal evidence, Jeromy has a fine list with links to some of the pertinent scientific research here: <https://www.emfanalysis.com/research>

Here is an article of his published in the magazine for the National Engineering Honor Society, a well received article that gives a concise introduction to EHS

<https://www.emfanalysis.com/new-paradigm-emf-science/>

If you are possibly suffering from EHS, he offers help with free info on his website, sale of his book, and with professional consulting. He also indicates he will try to help for free those whose EHS suffering has made them lose their income.

<https://www.emfanalysis.com/work-with-me/>

May the PA PUC and utilities and the Public learn quickly, so that the number of future casualties be minimized.

Please remember Susan and think of and feel what she went through. You may be in fine health now, and hopefully will never become a victim of EHS, but those who have become EHS never expected it to happen to them either.

To Your Honor Judge Elizabeth Barnes,

we wrote you in our last filing:

“We have filed this solely in self defense. It has been utterly exhausting, with very significant negative health impacts, to do the necessary research and present this under further threat of the deadline which we, totally unversed in legal technicalities, fortunately discovered in spite of having been denied decent courtesy of a Notice to Plead.

We must have time to rest and recuperate and look after our health. We must have time to look after other demands of life that have piled up, including doing what work we can do to make monetary ends meet.

We will file our amended “complaint” as soon as we are able. We use the quotes, because we are not complaining, we are merely mirroring an assault upon us, that it may dissolve in the light sufficiently for our utility finally to be moved to join hands with us towards a mutually beneficial solution.

We most sincerely hope all parties involved will be inspired by what we have tried to bring regarding the transformational potential of beauty for each and all of us.”

unfortunately there were health reversals that made it impossible to complete yet the amended complaint

The health reversals were such that, as we informed you, we would not be able to properly be present for the scheduled prehearing conference on July 10th 2018.

We wrote you and attorney’s for PPL requesting to have the conference rescheduled. Please see Exhibit Number 2 on page 35.

The conference was forced upon us anyway.

Because of this, clear mistakes were made by Willard during the prehearing conference. For example, as we see from our journal entry for the day, Willard asked for his comments about health to be off the record instead of asking for them to be confidential.

Because of the exhaustion of both of us and the enormous pain Elsbeth was under during the conference which precluded Willard tending to her in the moment, as he had been and continued to do 24/7 for months, it was impossible for even the one of us who could be forced to the phone, willard to be fully present and properly defend our scheduling needs during this conference.

Just as with the prehearing conference scheduling issue, we have again tried to reach your honor through email (see attached exhibit number 1 page 15) to enable this scheduling issue to be resolved in an understanding amicable way with all parties.

This has not been possible. Indeed it seems as though your honor is refusing to communicate with us further in this regard.

We are not versed with all the legal technicalities and their ramifications. We still prefer to hope and pray that human beings will decide to be human and reasonable and willing to sort things out.

Because it seems a game may be played against us to have us miss a procedural matter in order to play form over substance against us, because we are not a billion dollar utility, we file this now, even though it is not fully complete.

We intend to file this in more complete form with a letter from one of our doctors, and with further details about how to proceed, including specific suggestions.

These motions are medical necessities and also necessitated for other reasons which will be explicated in the more fully complete filing we seek to file after this one.

Further reasons for these motions are in our email correspondance which is included here as Exhibits. One main justification is that extensions will in no way whatsoever harm or damage PPL.

Motions Regarding Interim Order:

We hereby formally request Your Honor to

1st motion. Extend to us a 3 week extension to file a more complete motion for extension and further open ended extension for filing the amended complaint. (we have been led to understand an amended complaint can be filed any time up to 5 days before the hearing anyway. But much time is yet needed to get this worked out to properly attain justice for all.)

2nd motion Open up the schedule for reconsideration and determination after we have filed our complete motions for extension and rescheduling.

Verifications

I, Willard Sunstein, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter.

I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 30 August 2018

Willard Sunstein

Willard Sunstein

Complainant

I, Elsbeth Sunstein, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter.

I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 30. August 2018

Elsbeth Sunstein

Elsbeth Sunstein

Complainant

Exhibit Number 1

Recent Email correspondence with Judge Elizabeth Barnes in so far as she was able to and deigned to correspond. The last email and the one before which the last email resent were not acknowledged with a read receipt nor did any automatic answer come regarding being out of office. This is unlike earlier occasions. :

----- Message -----

Subject: Re: extension request Re: Sunstein v. PPL Electric - PPL's Proposed Hearing Dates

Date: Wed, 29 Aug 2018 14:53:28 -0400

From: Will <willardsunstein@fast.net>

To: Barnes, Elizabeth <EBARNES@pa.gov>

CC: Ryan, Devin <DRyan@PostSchell.com>, Amy E. Hirakis (aehirakis@pplweb.com) <aehirakis@pplweb.com>, Lent, Garrett <GLent@PostSchell.com>

Your Honor,

when i on other occasions sent email to you and ppl attorneys there was generally an automatic answer to my request of it having been read, or an email indicating out of office. in your case always. perhaps always from the attorneys, i will have to check that when i would have time. however in this instance it is as though my most important email below fell into a black hole in outer space. this i find quite an interesting and strange "coincidence". To doubly ensure receipt i am resending the email below to further ensure delivery.

we would appreciate it to have automatic indication of reads of email not rejected, as this appears to perhaps have been done.

thank you.

willard

On 27-Aug-18 22:59, Will wrote:

> Your Honor, Elisabeth Barnes,

>

> we thank you for your prompt attention to our email request for an

> extension... actually to file a motion for an extension.

>

> Perhaps your reason to demand we adhere to the presently impossible

> schedule for our amended complaint is because you somehow overlooked

> that we were very ill and furthermore, you somehow had the erroneous

> idea that the only thing new for the amended complaint would be that we
> seek accommodation under the ADA. Were that the case, we could concur.
> Indeed, were that the case, we would not be seeking to file an amended
> complaint, especially after the helpful email from ryan below. By the
> way, we are appreciative of your communicating, Mr. Ryan, one of the
> grounds with which you would object to accommodating us. thank you.
>
> However, as i recall from our prehearing conference, your honor, i am
> sure i mentioned the amended complaint would include other issues
> including fraud, theft, attempted theft and more.
>
> we do not know all the issues yet, but our intent is to claim also
> collusion to undermine democratic, regulatory and judicial governmental
> processes, collusion to undermine scientific inquiry and dissemination
> of knowledge, intentionally waste money on capital expenses known to be
> unnecessary for a smart grid, diverting resources away from what would
> be necessary for a truly smart grid, attempt to and in actuality
> invading privacy, religious intolerance and attempt to and intentions to
> directly interfere with religious practice and worship, blatant
> disregard of safety for customers, misinforming customers of serious
> safety issues, privacy issues, making the supply of electricity less
> secure, more unreliable ... all of the above issues lurking behind ppl's
> battle stance have been aggressively shoved in our face by ppl in the
> past months... this is the only reason we are forced to bring them.
>
> to see that the above issues are not simply fabrications from us, you
> can read how many of them, not all, are directly addressed in a paper
> written by one of our expert witnesses, timothy schoechle, an expert on
> the smart grid. <http://gettingsmarteraboutthesmartgrid.org/>
>
> we have learned enough to realize that wording is very important in
> these legal proceedings.
>
> we need to make sure that ryan has no legal ground to stand on with his
> disingenuous designs to strike from the record facts such as how the
> industry threatened the life of one of our expert witnesses, olle
> johanson, and carried out an attempt that came close to killing him and
> his wife.
>
> we also realize that the perjured testimony from the two totally
> unqualified witnesses ppl wishes to use has been accepted over and above

> testimony from truly qualified witnesses on behalf of the public.
>
> for this reason, and to more strongly support the further claims we will
> be making, claims which ppl will surely battle against instead of
> amicably seeking solutions with us, we will be seeking more witnesses...
> we are sure we can find them.... but this will take time.. we envision
> at least 10 witnesses maybe a dozen.
>
> furthermore, we really need to have time to write an interlocutory
> appeal. this will take some time. your honor apparently did not have or
> did not make time to investigate the claims made by ryan against our
> motions which your honor denied. ryan lied about renner being an
> expensive office boy/paralegal help instead of acting council when he
> was not moved to be admitted nor admitted pro hac vice. we can show the
> relevant testimony where renner explicitly identified himself as acting
> council contrary to ryan's claims. ryan simply lied. he may try and back
> pedal... saying this is now all made good through legal tricks done ex
> post facto... still, when ryan wrote what he wrote in reply to our
> motion, it was a lie; it still is a lie. there are other lies,
> omissions, distortions.... like ryan's boasting how israel was working
> at the prestigious dartmouth hospital, but ryan conveniently omitted
> that israel had his patient privileges revoked and was fired. israel
> tried to sue, but unsuccessfully.... because of external restrictions
> in the size of the filing, it will not be easy for us to make an
> interlocutory appeal that will reveal all the scandalous abuse of ryan,
> renner, davis and israel in such a way as to guarantee that each issue
> be given due attention, to ensure a just result. and indeed, even if we
> have that written it may well not get a just result in the pa puc.
> however, it is important that it be written so that it is there for the
> possibility that we must appeal our case to the commonwealth court. and
> judging by the cases before us this may well be necessary...
>
> would you really want to insist on schedules that effectively preclude
> proper presentations of substance necessary for justice to be ultimately
> achieved in our case? we hope not.
>
> we also intend in our amended complaint to add other parties to the
> complaint, in particular, peco, who has shared the same law firm with
> ppl and the same witnesses. we intend to add other parties beyond peco
> to the amended complaint.
>

> furthermore, i remember clearly stating in the prehearing conference on
> july 10th, that our agreement to the present schedule was with the
> assumption that our health would be improving such that we could begin
> working on the amended complaint in a couple weeks. this proved to have
> been overly optimistic.

>
> our health, though not yet stable, has only begun to be restored to the
> extent that we can turn to work on the amended complaint at all. we must
> be careful to not over-task ourselves in such a way as to contribute to
> yet another reversal in health being triggered.

>
> we did not clearly envision in the beginning of july how much work this
> writing would entail; this has come to us in many a sleepless night
> disturbed by ppl's vicious behavior towards the truth.

>
> you can see, your honor, that between our striving for truth and ppl's
> and ryan's unrelenting battle against it, this legal process grows in
> complexity and will require significantly more time to be justly and
> properly resolved.

>
> when we have not the health to work on the case, we have not the health
> to work on the case. when we do have sufficient health to work on the
> case, we still can't work on it 24/7 outwardly and maintain health,
> maintain our home and garden, work to earn money in an attempt to make
> ends meet and actually have a life. At most we can work something like
> 4 hours a day 20 days a month on the case without horribly sacrificing
> our health and ability to live. to force more from elderly people such
> as ourselves cruelly imposes incredible hardship. if you look at the
> issues above, you can see, your honor, that it could take a strong team
> of lawyers a lot of time to due justice to them and build a good case
> against giant corporate corruption. we are not billionaires like ppl and
> peco. we cannot just pass legal expenses on to the public. we are
> artists and cultural enthusiasts who had to learn the term "pro se" at
> the beginning of this all to defend our rights to live unmolested by our
> utility.

>
> in addition to properly writing the amended complaint, there will also
> be a lot work involved to properly pursue discovery etc...

>
> we emphasize again, there is absolutely no disadvantage for ppl in
> rescheduling. if there were, or any honest or even disguised

> disingenuous way to claim such, you can be sure ryan would already have
> done so.

>

> furthermore, the law clearly is formulated to recognize needs such as
> ours. see: § 31.15. Extensions of time.

> <https://www.pacode.com/secure/data/001/chapter31/s31.15.html>

>

> “Since the regulations of the Pennsylvania Code specifically provide for
> the discretionary granting of extensions and variances, the officials in
> whom the discretion rests are quasi-judicial or quasi-prosecutorial
> officers, and in absence of allegations of bad faith or corruption the
> officials are immune from criminal prosecution in granting extensions
> and variances, even though they were granted ex parte. In re Dwyer, 406
> A.2d 1355 (Pa. 1979).”

>

> we believe if you, your honor, would consider all the above with clarity
> and take just part of the above facts to heart, you would be moved to
> see the absolute necessity for an extension and a reworking of the
> schedule to fully serve justice and not horribly undermine our health.

>

> your honor, we pray you will uphold your honor and serve justice for all
> parties in this case without undermining anyone's health and livelihood.

>

> we thank you for your time and consideration.

>

> sincerely,

>

> willard

>

>

> On 27-Aug-18 16:21, Ryan, Devin wrote:

>> Your Honor,

>>

>> If the extent of Mr. Sunstein's amendment to the Complaint relates to
>> the ADA claim, PPL Electric would be willing to agree that the ADA
>> issues were raised in the existing Complaint and that no further
>> amendment to the Complaint is necessary. However, the Company still
>> reserves its rights to object to the presentation of evidence related
>> to the ADA claim, including on the grounds that ADA issues are beyond
>> the PUC's jurisdiction.

>>

>> Thank you.

>>

>> Devin Ryan

>> Associate

>> Post & Schell, P.C.

>> 17 North Second Street

>> 12th Floor

>> Harrisburg, PA 17101

>>

>> 717-612-6052 (Phone)

>> 717-731-1981 (Fax)

>> DRyan@PostSchell.com

>> www.postschell.com

>>

>>

>> -----Original Message-----

>> From: Barnes, Elizabeth [mailto:EBARNES@pa.gov]

>> Sent: Monday, August 27, 2018 2:44 PM

>> To: Ryan, Devin; Will

>> Cc: Amy E. Hirakis (aehirakis@pplweb.com); Lent, Garrett

>> Subject: RE: extension request Re: Sunstein v. PPL Electric - PPL's

>> Proposed Hearing Dates

>>

>> ALL:

>>

>> I am not persuaded to amend the procedural order at this time. Please
>> note any amended complaint should be filed with the Secretary's Bureau
>> by 2:30 p.m. on Friday, August 31st. The Secretary's Bureau is
>> closing early on Friday due to the Labor Day Holiday.

>> If I recall the prehearing conference correctly, Mr. Sunstein, your
>> main amendment was a claim that you were seeking an accommodation
>> under the Americans With Disabilities Act. That much is clear in the
>> transcript so far. If that is the extent of the amendment, perhaps
>> PPL will accept that as an issue, and there is no need for a formally
>> filed amended complaint.

>>

>> Regards,

>>

>>

>> Elizabeth H. Barnes

>> Administrative Law Judge

>> Pennsylvania Public Utility Commission
>> Office of Administrative Law Judge
>> Commonwealth Keystone Building
>> P.O. Box 3265
>> Harrisburg, PA 17105-3265
>> ebarnes@pa.gov

>>
>>
>>

>> -----Original Message-----

>> From: Ryan, Devin <DRyan@PostSchell.com>
>> Sent: Friday, August 24, 2018 10:27 AM
>> To: Will <willardsunstein@fast.net>; Barnes, Elizabeth <EBARNES@pa.gov>
>> Cc: Amy E. Hirakis (aehirakis@pplweb.com) <aehirakis@pplweb.com>;
>> Lent, Garrett <GLent@PostSchell.com>
>> Subject: RE: extension request Re: Sunstein v. PPL Electric - PPL's
>> Proposed Hearing Dates

>>

>> Your Honor,

>>

>> PPL Electric opposes any adjustments to the procedural schedule that
>> was adopted in the Third Interim Order. This case was initiated by
>> Mr. Sunstein nearly six months ago, when his formal complaint was
>> served on the Company on February 26, 2018. Under the procedural
>> schedule currently in effect, the evidentiary hearings will not be
>> held until January 24-25, 2018, approximately 11 months after the
>> complaint was served.

>>

>> Thank you.

>>

>> Devin Ryan
>> Associate
>> Post & Schell, P.C.
>> 17 North Second Street
>> 12th Floor
>> Harrisburg, PA 17101
>>
>> 717-612-6052 (Phone)
>> 717-731-1981 (Fax)
>> DRyan@PostSchell.com

>> <https://na01.safelinks.protection.outlook.com/?url=www.postschell.com&data=02%7C01%7Cebarnes%40pa.gov%7C35d1d1b586a34815877d08d609cda19a%7C418e284101284dd59b6c47fc5a9a1bde%7C1%7C0%7C636707176123786435&sdata=MbADHnfaTSgYqn9bzIeM62d1LSM8MKQv8uOHVoKy7Sg%3D&reserved=0>

>>

>>

>> -----Original Message-----

>> From: Will [mailto:willardsunstein@fast.net]

>> Sent: Friday, August 24, 2018 10:01 AM

>> To: Barnes, Elizabeth

>> Cc: Ryan, Devin; Amy E. Hirakis (aehirakis@pplweb.com); Lent, Garrett

>> Subject: extension request Re: Sunstein v. PPL Electric - PPL's

>> Proposed Hearing Dates

>> Importance: High

>>

>> Your Honor Elizabeth Barnes,

>>

>> we thank you for this earlier email of yours, and the one more

>> recently sent regarding transcripts. we started a reply yesterday and

>> will complete and send it when we can.

>>

>> this email of yours is very helpful; we unfortunately were not in a

>> state of health enabling a reply when you wrote it, nor were we before

>> or after your last order. even during the prehearing conference, we

>> did not have a sufficient state of health, nor because of the severe

>> pains elsbeth was suffering during the prehearing conference which

>> precluded my tending to her, and because of the exhaustion with

>> dealing 24/7 with health issues and a very recently ended long bout of

>> arrhythmia , did i have the presence of mind to be able to clearly

>> identify, articulate and defend our just scheduling needs during the

>> prehearing conference.

>>

>> the one time our health permitted us with considerable effort to

>> resume work on the amended complaint after the prehearing conference

>> was the day i wrote melissa. on that day, my optimism, combined with

>> feeling the pressure to meet deadlines, and our own desire to find

>> completion in this process, led us to be vastly overly hopeful

>> regarding our situation. the attempt to unduly stretch forces beyond

>> their natural limits enhanced and possibly led to issues flaring up

>> again. that night we had health reversals that have precluded working

>> on the amended complaint since then.

>>

>> we absolutely need to have an extension. even now as we are doing
>> better, our health still necessitates 5 doctor appointments this week.
>> as we mentioned before, these are all paid for completely out of
>> pocket because we have no medical insurance. we must rush out to an
>> appointment immediately after sending this email, done somewhat in
>> haste because of timing necessities...

>>

>> we appreciate very much your including in your last order a clause
>> explicitly mentioning the possibility of schedule changes when these
>> would be essential.

>>

>> we have tried to begin writing a motion asking for a schedule change,
>> but this will take time. it is sad to say, but we anticipate attorney
>> ryan will continue his approach to deny everything and try and force
>> through something untenable for any seeking justice here.

>>

>> a clear sign of this in the past has been how he scheduled his "experts"
>> for a hearing in november, after i had written him that we thought it
>> might work at the times you suggested as possible in the end of
>> january, but certainly not before. he then used this schedule of his
>> to try and force through that the hearing would march to his schedule..

>>

>> we are so very thankful you were moved to not push for november and
>> accepted january.

>>

>> i think all of us, yourself, ryan, and my wife and i are together in one
>> regard: we want this concluded with all efficiency and brought to a
>> conclusion as soon as possible.

>>

>> where we differ is regarding what is necessary for this to be done in
>> a just manner. because we believe ryan will try and persuade you in a
>> way that is contrary to justice being served, a very good deal of work
>> must be put into creating our motion for it to be effective for
>> justice, to ensure no form over substance through a schedule that
>> cannot be handled by one of the parties to this case.

>>

>> also our health, though thankfully improving, is not yet very stabilized.

>>

>> for these reasons, we seek from you an extension till mid september to

>> write this motion for determining a new and just schedule.

>>

>> then you will be in a knowledgeable position to decide on a schedule

>> fitting for all parties.

>>

>> we thank you very much for your understanding.

>>

>> sincerely,

>>

>> willard

>>

>>

>>

>>> On 25-Jul-18 09:00, Barnes, Elizabeth wrote:

>>>> Mr. Sunstein:

>>>>

>>>> I can start a hearing as early as 9 a.m. and go until as late as 6
>>>> p.m. each day with either a one hour lunch or half hour lunch and two
>>>> 15 minute breaks. The lights automatically shut off in the hearing
>>>> room at 6 p.m. I generally accommodate the availability of
>>>> witnesses as much as I am able. I would encourage you to work with
>>>> Mr. Ryan in developing the order the witnesses will be called.
>>>> Generally, Complainant puts on all witnesses first. But if a witness
>>>> can only be available the second day, I have made exceptions in the
>>>> past.

>>>>

>>>> Regards,

>>>>

>>>>

>>>> Elizabeth H. Barnes

>>>> Administrative Law Judge

>>>> Pennsylvania Public Utility Commission Office of Administrative Law

>>>> Judge Commonwealth Keystone Building P.O. Box 3265 Harrisburg, PA

>>>> 17105-3265 ebarnes@pa.gov

>>>>

>>>>

>>>>

>>>>

>>>>

>>>> -----Original Message-----

>>>> From: Will <willardsunstein@fast.net>

>>>> Sent: Tuesday, July 24, 2018 3:01 PM
>>>> To: Barnes, Elizabeth <EBARNES@pa.gov>
>>>> Cc: Ryan, Devin <DRyan@PostSchell.com>; Amy E. Hirakis
>>>> (aehirakis@pplweb.com) <aehirakis@pplweb.com>; Lent, Garrett
>>>> <GLent@PostSchell.com>
>>>> Subject: Re: Sunstein v. PPL Electric - PPL's Proposed Hearing Dates

>>>>

>>>> Your Honor,

>>>>

>>>> i have not heard from one of my witnesses in europe yet.

>>>>

>>>> however, i can confirm that for 4 of my witnesses it will work in
>>>> the two days you have tentatively scheduled, thursday and friday, the
>>>> 24th and 25 of January.

>>>>

>>>> i have not yet heard from our 5th witness, and will let you know as
>>>> soon as we know whether it can work for her on those dates.. i have
>>>> my doubts that even with 4 witnesses, the hearing can be completed in
>>>> 2 days. as i wrote attorney ryan earlier, we may also seek to find
>>>> more witnesses, because the past precedent shows that it is very hard
>>>> to get a judge to rule in such a way that accounts for the truth
>>>> rather than along the lines of industrial shill witnesses who choose
>>>> to perjure themselves.

>>>>

>>>> the one witness in europe from whom i have heard, requests to be able
>>>> to testify at a time when he does not have to be up at night for it;
>>>> another witness requested to take the stand at the beginning of the
>>>> court day.

>>>>

>>>> could you please tell us the hours of the hearing? beginning and end
>>>> and when breaks will be, and how long the protocol takes till a
>>>> witness is called to take the stand?

>>>>

>>>> thank you very much for your help in these practicalities,

>>>>

>>>> willard

>>>>

>>>>

>>>>

>>>> On 18-Jul-18 13:50, Barnes, Elizabeth wrote:

>>>>> Please tentatively reserve the January 24 and 25, 2019 days for

>>>> hearings. Mr. Sunstein, please let me know within 7 days if these
>>>> days will work for you. Thank you.

>>>>

>>>>

>>>> Elizabeth H. Barnes
>>>> Administrative Law Judge
>>>> Pennsylvania Public Utility Commission Office of Administrative Law
>>>> Judge Commonwealth Keystone Building P.O. Box 3265 Harrisburg, PA
>>>> 17105-3265 ebarnes@pa.gov

>>>>

>>>>

>>>>

>>>> -----Original Message-----

>>>> From: Will <willardsunstein@fast.net>

>>>> Sent: Tuesday, July 17, 2018 10:58 PM

>>>> To: Barnes, Elizabeth <EBARNES@pa.gov>

>>>> Cc: Ryan, Devin <DRyan@PostSchell.com>; Amy E. Hirakis

>>>> (aehirakis@pplweb.com) <aehirakis@pplweb.com>; Lent, Garrett

>>>> <GLent@PostSchell.com>

>>>> Subject: Re: Sunstein v. PPL Electric - PPL's Proposed Hearing Dates

>>>>

>>>> Your Honor Elizabeth Barnes,

>>>>

>>>> i apologize that we have not yet been able to find dates that work

>>>> for our witnesses. we are doing all we can towards finding these

>>>> dates.

>>>>

>>>> i sent the following email pasted below my name as answer attempting

>>>> to work with mr ryan, an answer to mr. ryan's email also pasted.

>>>>

>>>> this email is longer than i would wish it had to be.. .but we feel

>>>> it important for you to know our situation and to document in this

>>>> legal proceeding what we are being put through, for any and all

>>>> jurisdictions that achieving justice requires.

>>>>

>>>> BEGIN CONFIDENTIAL:

>>>>

>>>>

>>>>>

>>>>>

.....while
>>>>> we have nevertheless attempted to push the limits to do all we can,
>>>>> there are unavoidable delays.

>>>>>

>>>>> END CONFIDENTIAL

>>>>>

>>>>> as we have written mr ryan below, we have been through health crises
>>>>> before and hold confident faith that, with our passion for life to
>>>>> serve truth beauty and humanity here on earth, we will make it
>>>>> through the present challenges to our health.

>>>>>

>>>>> the present passage to health is made particularly difficult because
>>>>> in this instance we are burdened with the extra stress of PPL's
>>>>> decision to battle us to death with all legal processes they can pay
>>>>> for with money they milk from all of us customers.

>>>>>

>>>>> we realize that PPL and its cohorts don't care one iota if they maim
>>>>> or kill their vulnerable customers in the way they are doing with
>>>>> unnecessary and dangerous microwave and other emf.

>>>>>

>>>>> Loyd's of London sees the writing on the wall and will not insure
>>>>> them against such liability.

>>>>>

>>>>> we believe at some point, in face of undeniable truth presented by
>>>>> us and others in similar positions, PPL will see the writing on the
>>>>> wall just as Loyd's of London, and PPL will finally decide to abide

>>>>> by the laws of our state and country and seek to accommodate our
>>>>> health needs.

>>>>>

>>>>> if not, we are determined to take this case through all
>>>>> jurisdictions necessary to secure justice.

>>>>>

>>>>> we must emphasize ever and again, that the decisions of others to
>>>>> battle against us, instead of working together to find sensible
>>>>> solutions places a great strain upon us that directly hinders
>>>>> healing. our passage through crisis towards full health will become
>>>>> all the easier when when PPL decides to take a law abiding position.
>>>>> we would not be surprised, however, to find confirmed that one
>>>>> reason PPL continues to battle us is in the very hopes of destroying
>>>>> our health sufficiently such that we would cave in to their
>>>>> illegalities.

>>>>> this has already happened in other cases involving smart meters and
>>>>> utilities. we are determined this will not happen in our case.

>>>>>

>>>>> i will continue working on getting dates that work in your proposed
>>>>> time frame. it has been hard to reach witnesses, not only because of
>>>>> our situation, but also most likely because of vacations.

>>>>>

>>>>> we thank you for any and all understanding you find for what we
>>>>> write above.

>>>>>

>>>>> sincerely,

>>>>>

>>>>> willard

>>>>>

>>>>>

>>>>>

>>>>>

>>>>> ----- Forwarded Message -----

>>>>> Subject: Re: Sunstein v. PPL Electric - Proposed Hearing Dates

>>>>> Date: Tue, 17 Jul 2018 12:23:19 -0400

>>>>> From: Will <willardsunstein@fast.net>

>>>>> To: Ryan, Devin <DRyan@PostSchell.com>

>>>>>

>>>>> Thank you for writing again, Mr. Ryan.

>>>>>

>>>>> in these days, i have not been able to tend to emails as i would want.

>>>>>

>>>>> under our present circumstances, i have been doing my best to reach
>>>>> our witnesses and find a schedule that works.

>>>>>

>>>>> this has not yet been possible because of unavoidable health
>>>>> necessities we continue to be dealing with and the extremely serious
>>>>> impact on daily life and survival. Neither yourself, nor Judge
>>>>> Elizabeth Barnes seem to recognize the severity of what we are
>>>>> presently going through.

>>>>>

>>>>> We have been through health crises in the past and confidently hold
>>>>> faith we will get through the present in time; we have a passion for
>>>>> life and serving truth and beauty and humanity here on earth.

>>>>>

>>>>> However, the stress of what you continue to impose upon us by all
>>>>> refusal to work together places an additional burden that we have
>>>>> never had to deal with before. We will continue to hope that at some
>>>>> point you and PPL will open your eyes and see it also in your best
>>>>> interests to decide to work together with us for a solution instead
>>>>> of spending money you must milk from your customers to continue
>>>>> battling us.

>>>>>

>>>>> i will continue to do my best to find dates that work within the
>>>>> parameters offered. i hope within another week to do so, though it
>>>>> would be my wish to more quickly do so.

>>>>>

>>>>> i also take note of the dates you are suggesting and will see if
>>>>> they can work for our witnesses too.

>>>>>

>>>>> sincerely,

>>>>>

>>>>> willard

>>>>>

>>>>>

>>>>>

>>>>> On 17-Jul-18 11:42, Ryan, Devin wrote:

>>>>> > Mr. Sunstein,

>>>>> >

>>>>> > I am following up on my email below. Are you available for
>>>>> hearings on > January 24 and 25, 2018?

>>>>> >

>>>>> > Thank you.
 >>>>> >
 >>>>> > *Devin Ryan*
 >>>>> > *Associate*
 >>>>> > *Post & Schell, P.C.*
 >>>>> > 17 North Second Street
 >>>>> > 12th Floor
 >>>>> > Harrisburg, PA 17101
 >>>>> >
 >>>>> > 717-612-6052 (Phone)
 >>>>> > 717-731-1981 (Fax)
 >>>>> > DRyan@PostSchell.com <mailto:DRyan@PostSchell.com> >
 >>>>> https://na01.safelinks.protection.outlook.com/?url=www.postschell.co
 >>>>> m&data=02%7C01%7Ce Barnes%40pa.gov
 >>>>> %7C35d1d1b586a34815877d08d609cd
 >>>>> a19a%7C418e284101284dd59b6c47fc5a9a1bde
 >>>>> %7C1%7C0%7C636707176123786435
 >>>>> &sdata=MbADHnfaTSgYqn9bzIeM62d1LSM8MKQv8uOHVoKy7Sg
 >>>>> %3D&reserv
 >>>>> ed=0
 >>>>> <https://na01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww
 >>>>> http://postschell.com/
 >>>>> &data=02%7C01%7Ce Barnes%40pa.gov%7C35d1d1b586a
 >>>>> 34815877d08d609cda19a%7C418e284101284dd59b6c47fc5a9a1bde
 >>>>> %7C1%7C0%7C6
 >>>>> 36707176123786435&sdata=%2BFEDGXTjQ%2FZhOVytR3d0zcwDR1Cy
 >>>>> %2BtIZNS
 >>>>> I%2BW1NLH3s%3D&reserved=0>
 >>>>>
 >>>>> >
 >>>>> > *From:* Ryan, Devin
 >>>>> > *Sent:* Monday, July 16, 2018 9:41 AM > *To:* 'Will'
 >>>>> (willardsunstein@fast.net) > *Subject:* Sunstein v. PPL Electric -
 >>>>> Proposed Hearing Dates > > Good morning, Mr. Sunstein, > > Per
 >>>>> the direction of Judge Barnes, I have consulted with the Company >
 >>>>> about two consecutive dates in the last two weeks of January that it
 >>>>>> would be available for hearings.
 >>>>> >
 >>>>> > PPL Electric is available for hearings on January 24 and 25,
 >>>>> 2018.
 >>>>> >

>>>> > Please let me know whether you also are available for those
>>>> dates.
>>>> >
>>>> > As a reminder, Judge Barnes ordered us to provide the potential
>>>> hearing > dates by tomorrow.
>>>> >
>>>> > Thank you.
>>>> >
>>>> > *Devin Ryan*
>>>> > *Associate*
>>>> > *Post & Schell, P.C.*
>>>> > 17 North Second Street
>>>> > 12th Floor
>>>> > Harrisburg, PA 17101
>>>> >
>>>> > 717-612-6052 (Phone)
>>>> > 717-731-1981 (Fax)
>>>> > DRyan@PostSchell.com <mailto:DRyan@PostSchell.com> >
>>>> > [https://na01.safelinks.protection.outlook.com/?url=www.postschell.com](https://na01.safelinks.protection.outlook.com/?url=www.postschell.com&data=02%7C01%7Cebarnes%40pa.gov%7C35d1d1b586a34815877d08d609cd%7C1%7C0%7C636707176123786435&sdata=MbADHnfaTSgYqn9bzIeM62d1LSM8MKQv8uOHVoKy7Sg%3D&reserved=0)
>>>> > [m&data=02%7C01%7Cebarnes%40pa.gov](https://na01.safelinks.protection.outlook.com/?url=www.postschell.com&data=02%7C01%7Cebarnes%40pa.gov%7C35d1d1b586a34815877d08d609cd%7C1%7C0%7C636707176123786435&sdata=MbADHnfaTSgYqn9bzIeM62d1LSM8MKQv8uOHVoKy7Sg%3D&reserved=0)
>>>> > [%7C35d1d1b586a34815877d08d609cd](https://na01.safelinks.protection.outlook.com/?url=www.postschell.com&data=02%7C01%7Cebarnes%40pa.gov%7C35d1d1b586a34815877d08d609cd%7C1%7C0%7C636707176123786435&sdata=MbADHnfaTSgYqn9bzIeM62d1LSM8MKQv8uOHVoKy7Sg%3D&reserved=0)
>>>> > [a19a%7C418e284101284dd59b6c47fc5a9a1bde](https://na01.safelinks.protection.outlook.com/?url=www.postschell.com&data=02%7C01%7Cebarnes%40pa.gov%7C35d1d1b586a34815877d08d609cd%7C1%7C0%7C636707176123786435&sdata=MbADHnfaTSgYqn9bzIeM62d1LSM8MKQv8uOHVoKy7Sg%3D&reserved=0)
>>>> > [%7C1%7C0%7C636707176123786435](https://na01.safelinks.protection.outlook.com/?url=www.postschell.com&data=02%7C01%7Cebarnes%40pa.gov%7C35d1d1b586a34815877d08d609cd%7C1%7C0%7C636707176123786435&sdata=MbADHnfaTSgYqn9bzIeM62d1LSM8MKQv8uOHVoKy7Sg%3D&reserved=0)
>>>> > [&data=MbADHnfaTSgYqn9bzIeM62d1LSM8MKQv8uOHVoKy7Sg](https://na01.safelinks.protection.outlook.com/?url=www.postschell.com&data=02%7C01%7Cebarnes%40pa.gov%7C35d1d1b586a34815877d08d609cd%7C1%7C0%7C636707176123786435&sdata=MbADHnfaTSgYqn9bzIeM62d1LSM8MKQv8uOHVoKy7Sg%3D&reserved=0)
>>>> > [%3D&reserved](https://na01.safelinks.protection.outlook.com/?url=www.postschell.com&data=02%7C01%7Cebarnes%40pa.gov%7C35d1d1b586a34815877d08d609cd%7C1%7C0%7C636707176123786435&sdata=MbADHnfaTSgYqn9bzIeM62d1LSM8MKQv8uOHVoKy7Sg%3D&reserved=0)
>>>> > [ed=0](https://na01.safelinks.protection.outlook.com/?url=www.postschell.com&data=02%7C01%7Cebarnes%40pa.gov%7C35d1d1b586a34815877d08d609cd%7C1%7C0%7C636707176123786435&sdata=MbADHnfaTSgYqn9bzIeM62d1LSM8MKQv8uOHVoKy7Sg%3D&reserved=0)
>>>> > [<https://na01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww](https://na01.safelinks.protection.outlook.com/?url=www.postschell.com&data=02%7C01%7Cebarnes%40pa.gov%7C35d1d1b586a34815877d08d609cd%7C1%7C0%7C636707176123786435&sdata=MbADHnfaTSgYqn9bzIeM62d1LSM8MKQv8uOHVoKy7Sg%3D&reserved=0)
>>>> > [http://postschell.com/](https://na01.safelinks.protection.outlook.com/?url=www.postschell.com&data=02%7C01%7Cebarnes%40pa.gov%7C35d1d1b586a34815877d08d609cd%7C1%7C0%7C636707176123786435&sdata=MbADHnfaTSgYqn9bzIeM62d1LSM8MKQv8uOHVoKy7Sg%3D&reserved=0)
>>>> > [&data=02%7C01%7Cebarnes%40pa.gov%7C35d1d1b586a](https://na01.safelinks.protection.outlook.com/?url=www.postschell.com&data=02%7C01%7Cebarnes%40pa.gov%7C35d1d1b586a34815877d08d609cd%7C1%7C0%7C636707176123786435&sdata=MbADHnfaTSgYqn9bzIeM62d1LSM8MKQv8uOHVoKy7Sg%3D&reserved=0)
>>>> > [34815877d08d609cd%7C1%7C0%7C6](https://na01.safelinks.protection.outlook.com/?url=www.postschell.com&data=02%7C01%7Cebarnes%40pa.gov%7C35d1d1b586a34815877d08d609cd%7C1%7C0%7C636707176123786435&sdata=MbADHnfaTSgYqn9bzIeM62d1LSM8MKQv8uOHVoKy7Sg%3D&reserved=0)
>>>> > [36707176123786435&data=%2BFEDGXTjQ%2FZhOVytR3d0zcwdR1Cy](https://na01.safelinks.protection.outlook.com/?url=www.postschell.com&data=02%7C01%7Cebarnes%40pa.gov%7C35d1d1b586a34815877d08d609cd%7C1%7C0%7C636707176123786435&sdata=MbADHnfaTSgYqn9bzIeM62d1LSM8MKQv8uOHVoKy7Sg%3D&reserved=0)
>>>> > [%2BtIZNS](https://na01.safelinks.protection.outlook.com/?url=www.postschell.com&data=02%7C01%7Cebarnes%40pa.gov%7C35d1d1b586a34815877d08d609cd%7C1%7C0%7C636707176123786435&sdata=MbADHnfaTSgYqn9bzIeM62d1LSM8MKQv8uOHVoKy7Sg%3D&reserved=0)
>>>> > [I%2BW1NLH3s%3D&reserved=0>](https://na01.safelinks.protection.outlook.com/?url=www.postschell.com&data=02%7C01%7Cebarnes%40pa.gov%7C35d1d1b586a34815877d08d609cd%7C1%7C0%7C636707176123786435&sdata=MbADHnfaTSgYqn9bzIeM62d1LSM8MKQv8uOHVoKy7Sg%3D&reserved=0)
>>>> >
>>>> >
>>>> -----
>>>> ----
>>>> > This message is from the law firm Post & Schell, P.C. . This
>>>> message and > any attachments may contain legally privileged or

>>>> confidential > information, and are intended only for the
>>>> individual or entity > identified above as the addressee. If you
>>>> are not the addressee, or if > this message has been addressed to
>>>> you in error, you are not authorized > to read, copy, or distribute
>>>> this message and any attachments, and we > ask that you please
>>>> delete this message and attachments (including all > copies) and
>>>> notify the sender by return e-mail or by phone at > 215-587-1000.
>>>> Delivery of this message and any attachments to any person > other
>>>> than the intended recipient(s) is not intended in any way to waive
>>>>> confidentiality or a privilege. All personal messages express
>>>> views only > of the sender, which are not to be attributed to Post
>>>> & Schell, P.C., > and may not be copied or distributed without this
>>>> statement.

>>>>

>>>>

>>>>

>>>> On 17-Jul-18 14:50, Ryan, Devin wrote:

>>>>> Your Honor,

>>>>>

>>>>> Per your direction at last week's prehearing conference, I
>>>>> conferred with the Company, its witnesses, and Mr. Sunstein about
>>>>> two consecutive dates in the last two weeks of January that we all
>>>>> would be available for hearings.

>>>>>

>>>>> Based on those discussions, the Company proposes hearings on
>>>>> January

>>>>> 24 and 25, 2018. However, my understanding is that Mr. Sunstein
>>>>> has been unable to determine the dates in the last two weeks of
>>>>> January that he and his witnesses would be available.

>>>>>

>>>>> Thank you.

>>>>>

>>>>> *Devin Ryan*

>>>>> *Associate*

>>>>> *Post & Schell, P.C.*

>>>>> 17 North Second Street

>>>>> 12th Floor

>>>>> Harrisburg, PA 17101

>>>>>

>>>>> 717-612-6052 (Phone)

>>>>> 717-731-1981 (Fax)

>>>>> DRyan@PostSchell.com <mailto:DRyan@PostSchell.com>
>>>>> https://na01.safelinks.protection.outlook.com/?url=www.postschell.c
>>>>> om
>>>>> &
>>>>> amp;data=02%7C01%7Cebarnes%40pa.gov%7C962b20135ffc460f5e7808d5ec5a3
>>>>> cf
>>>>> 5
>>>>> %7C418e284101284dd59b6c47fc5a9a1bde
>>>>> %7C1%7C1%7C636674794679160879&am
>>>>> p;
>>>>> s
>>>>> data=%2BKuLHxYuEYH4a9r56C8Jujyp%2FQZhcDEHfKUKSju4Zws
>>>>> %3D&reserve
>>>>> d=
>>>>> 0
>>>>> <https://na01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.
>>>>> p
>>>>> https://na01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fost
>>>>> http://schell.com/
>>>>> &data=02%7C01%7Cebarnes%40pa.gov%7C35d1d1b586a3481
>>>>> 5877d08d609cda19a%7C418e284101284dd59b6c47fc5a9a1bde
>>>>> %7C1%7C0%7C6367
>>>>> 07176123786435&sdata=QZ88OPBO%2FQ2jX3agqMuq
>>>>> %2Fe2n4N6BjEY2UjsuPU
>>>>> 4CDxs%3D&reserved=0
>>>>> &data=02%7C01%7Cebarnes%40pa.gov%7C962b20135ffc46
>>>>> 0
>>>>> f5e7808d5ec5a3cf5%7C418e284101284dd59b6c47fc5a9a1bde
>>>>> %7C1%7C1%7C6366
>>>>> 74
>>>>> 7
>>>>> 94679170887&sdata=8yVARn69RXOk35xiET8JU2G
>>>>> %2FOXxEzxKAJ1uNvpQd4mw
>>>>> %3
>>>>> D
>>>>> &reserved=0>
>>>>>
>>>>> -----
>>>>> --
>>>>> -
>>>>> -- This message is from the law firm Post & Schell, P.C. . This

>>>>> message and any attachments may contain legally privileged or
>>>>> confidential information, and are intended only for the individual
>>>>> or entity identified above as the addressee. If you are not the
>>>>> addressee, or if this message has been addressed to you in error,
>>>>> you are not authorized to read, copy, or distribute this message
>>>>> and any attachments, and we ask that you please delete this message
>>>>> and attachments (including all
>>>>> copies) and notify the sender by return e-mail or by phone at
>>>>> 215-587-1000. Delivery of this message and any attachments to any
>>>>> person other than the intended recipient(s) is not intended in any
>>>>> way to waive confidentiality or a privilege. All personal messages
>>>>> express views only of the sender, which are not to be attributed to
>>>>> Post & Schell, P.C., and may not be copied or distributed without
>>>>> this statement.

Exhibit Number 2

Some email correspondence immediately prior to prehearing conference of 10 July 2018 :

----- Forwarded Message -----

Subject: It is most unfortunately impossible to attend on July 10th

Date: Mon, 9 Jul 2018 00:10:27 -0400

From: Will <willardsunstein@fast.net>

To: Barnes, Elizabeth <EBARNES@pa.gov>

CC: dryan@postschell.com <dryan@postschell.com>, Amy E. Hirakis

(aehirakis@pplweb.com) <aehirakis@pplweb.com>, Lent, Garrett

<GLent@PostSchell.com>, kldock@pplweb.com

Your Honor Elizabeth Barnes,

we apologized to you for being late in completing the memorandum. we were hoping to be able to finish this weekend the memorandum you have requested but we have been unable to complete it due to further debilitating health issues of myself and my wife.

We were hoping, to hear from you a favorable response to our urgent request to postpone the prehearing conference due to ongoing health issues of both of us who would not be able to participate meaningfully in a telephone conference with your Honor and PPL attorneys.

Please accept our further apologizes that we must write again now, because we have had and have such severe and continuing health issues since we last wrote, with more medical appointments over this weekend even, that it will not be possible to either complete the memorandum before the conference, nor for us to both attend the conference..

We do feel it would be less stress for us, and for this reason also more conducive to justice were Your Honor to answer favorably our earlier sent urgent request to convert the prehearing conference into an exchange of emails instead, which would be a reasonable accommodation for our ongoing health issues.

while we do our very best to deal with the stresses of life, none compares in any way to the stress shoved upon us by PPL choosing to battle us rather than work together with us to accommodate our disabilities in such a manner that is a win win for all parties involved.

That said, we will, of course, continue to do our very best to work with you and fulfill all Your Honor's orders on as timely a basis as possible.

With further treatments, we hope to be strong enough physically to be able to complete our memorandum in a week or two.

we reaffirm again that we really wish to go forward here with all God's speed and will do our very best in that regard.

We hope that Attorney Ryan would see the light and join us in the most expedient way to speed things up. the most expedient way to speed things up is to work together with us instead of against us.

Because we are not lawyers and have neither the training nor other resources Attorney Ryan has at his disposal in a large and established firm of lawyers and the resources of a multi-billion dollar company to pay for it all, his attacks really stress and burden us with an enormous work load that harms our already vulnerable health and slows down the whole process.

Would PPL ever choose to work with us instead of against us, then this would speed up the process towards settlement enormously.

If Your Honor would so wish we will obtain for you a professional note confirming that it is not possible for us to both attend the conference on this tuesday july 10th.

we do very much appreciate your respecting our pressing essential health needs in this situation.

sincerely,

willard