

3835 Acorn Street
Pittsburgh, PA 15207

December 17, 2018

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

Re: Miranda Grace Edwards v. Duquesne Light Company
Docket No. C-2018-3002741

Dear Secretary Chiavetta:

Attached please find the Complainant's (my) response to Duquesne Light Company's (DLC) Motion to Compel Discovery Responses. It has been submitted in accordance with the deadline of December 17, 2018. This deadline does not exceed the five-day time frame of DLC Counsel's Notice to Plead, pursuant to 52 PA. Code § 1.12.

A copy of this document has been served upon the Respondent's Counsel, Shane Miller, Esq., in accordance with Commission regulations.

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

Sincerely,



M. Grace Edwards
Complainant
msea.mdew@gmail.com

Attachment

Cc: Shane Miller, Esquire, and Jeremy V Farrell, Esquire, Counsel for Duquesne Light Company (via email) (with attachment)

3835 Acorn Street
Pittsburgh, PA 15207

December 17, 2018

Shane Miller, Esquire
1500 One PPG Place
Pittsburgh, PA 15222

Re: Miranda Grace Edwards v. Duquesne Light Company
Docket No. C-2018-3002741

Dear Mr. Miller:

Attached please find the Complainant's (my) responses to your Motion to Compel Discovery Responses. It has been submitted in accordance with your deadline of December 17, 2018. This deadline does not exceed the five-day time frame of DLC Counsel's Notice to Plead, pursuant to 52 PA. Code § 1.12.

A copy of this document has been filed with the Pennsylvania Public Utilities Commission.

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

Sincerely,



M. Grace Edwards
Complainant
msea.mdew@gmail.com

Attachment

Cc: Jeremy V Farrell, Esquire, Counsel for Duquesne Light Company (via email) (with attachment)

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

MIRANDA GRACE EDWARDS,

Complainant,

vs.

DUQUESNE LIGHT COMPANY,

Respondent.

No. C-2018-3002741

Responses to Respondent's

MOTION TO COMPEL DISCOVERY RESPONSES

Filed by Miranda Grace Edwards

msea.mdew@gmail.com
3835 Acorn Street
Pittsburgh, PA 15207

**COMPLAINANT'S RESPONSES TO RESPONDENT'S MOTION TO COMPEL DISCOVERY
RESPONSES**

**TO: RESPONDENT'S GENERAL COUNSEL, SHANE MILLER, ESQUIRE; AND JEREMY V
FARRELL, ESQUIRE**

**THESE PAGES CONSTITUTE THE FILING OF MY WRITTEN RESPONSE TO THE FIRST SET OF
DISCOVERY REQUESTS SERVED ON ME BY RESPONDENT DUQUESNE LIGHT COMPANY.
THESE HAVE BEEN SUBMITTED TO YOU PER THE DEADLINE OF DECEMBER 17, 2018. THIS
DEADLINE DOES NOT EXCEED THE FIVE-DAY TIME FRAME OF DLC COUNSEL'S NOTICE TO
PLEAD, PURSUANT TO 52 PA Code § 1.12.**



Miranda Grace Edwards

December 17, 2018

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MIRANDA GRACE EDWARDS,

Complainant,

vs.

DUQUESNE LIGHT COMPANY,

Respondent.

No. C-2018-3002741

RESPONSES TO RESPONDENT'S MOTION TO COMPEL DISCOVERY RESPONSES

AND NOW comes Complainant Miranda Grace Edwards ("I") and hereby files this, my Responses to Respondent's Motion to Compel Discovery Responses.

General objections: I continue to object to each and all of the Respondent's Discovery Requests insofar as their First Set of Discovery Requests was filed before I had a chance to respond to the Respondent's Preliminary Objections or Answer and New Matter. Some of the information the Respondent requested is contained in my responses to their Preliminary Objections and Answer and New Matter. Other information is irrelevant to my Formal Complaint. Still, I will address these points again herein as they are raised.

1-19. No response necessary.

20. DLC Counsel's statement: Duquesne Light contends that Complainant should be required to produce the documents requested in Discovery Request No. 2 because Complainant has asserted in her Complaint that the installation of a smart meter at the Property by Duquesne Light would negatively affect her health. Given that the Complaint has placed her health at issue, Duquesne Light is entitled to obtain hospital and medical records that allegedly support her claim. This information is not privileged and is directly "relevant to the subject matter involved in the pending action" and "is reasonably calculated to lead to the discovery of admissible evidence." See Pa. R.C.P. 4003.1(a)-(b). Duquesne Light is willing to enter into a confidentiality agreement with Complainant to protect her hospital and medical records.

ANSWER:

I refute DLC's contention that they are "entitled to obtain" my personal medical information. I am not claiming to be highly sensitive to radiofrequency (RF) radiation from smart meters or to be a member of an especially vulnerable group. Nor am I claiming to have suffered health effects from a smart meter that has been installed on my Property, because no smart meter has been installed on my Property. Therefore, my

“hospital and medical records” contain no information that will “allegedly support [my] claim.”

DLC contends that “this information is not privileged.” It seems to me that “hospital and medical records” constitute perhaps the most personal type of information about an individual. They certainly fall into the category of *confidential* information. My efforts to understand how the term “privileged” is used in law revealed that it refers to the disclosure of confidential information in court or during other legal proceedings. Apparently, clinical professionals must often consider whether information is privileged. An article in *Social Work Today* at <https://www.socialworktoday.com/archive/EoEnovDec07.shtml> states, “Courts commonly cite the following four conditions that must be satisfied for information to be considered privileged:

- The parties involved in the conversation assumed that it was confidential.
- Confidentiality is an important element in the relationship.
- The broader community recognizes the importance of this relationship.
- The harm caused by the disclosure of the confidential information would outweigh the benefits of disclosure during legal proceedings.”

The information in my “hospital and medical records” meets all four of these criteria. I must therefore assume that DLC contends “this information is not privileged” based on their assertions about its relevance to my Formal Complaint. But I have already stated why my “hospital and medical records” contain no information that will “allegedly support [my] claim.” They are not directly “relevant to the subject matter involved in the pending action” or “...reasonably calculated to lead to the discovery of admissible evidence.” My medical information is privileged and unrelated to my Formal Complaint.

DLC is asking Your Honor to compel me to disclose my own confidential information to them even though I am not planning to introduce any of it into these proceedings to bolster my claims. I respectfully ask Your Honor to deny their request.

21-22. No response necessary.

23. DLC Counsel’s statement: Duquesne Light contends that Complainant should be required to produce the documents requested in Discovery Request No. 4 because although the Presiding Administrative Law Judge dismissed Complainant’s claim that Duquesne Light’s claims under the Fourth Amendment to the United States Constitution, she still appears to claim that Duquesne Light’s smart meters infringe upon her privacy rights. Given that Complainant has placed her privacy at issue in this case, Duquesne Light is entitled to obtain any documents that allegedly support her claim.

ANSWER:

As I stated in my initial response to Discovery Request No. 4, DLC’s request is premature. I

am in the process of gathering information and facts that support my claim. DLC's answers to my interrogatories will help inform additional facts that support my claim. But I could never gather and produce "all" Documents that support my claim because so much such information exists—some of which is unavailable to me. I will do my best, but this is why I called DLC's Discovery Request No. 4 "overly burdensome to the point of impossibility."

As Your Honor can see in DLC Counsel's Exhibit B, I did provide the following list that includes a few of the reasons I believe the forced installation of a smart meter on my home would violate my privacy.

- Smart meters monitor household activity and occupancy. They individually identify electrical devices inside the home and record when they are operated.
- Smart meters transmit wireless signals that may be intercepted by unauthorized and unknown parties.
- Data about occupants' daily habits and activities is collected, recorded, and stored in permanent databases that can be accessed by parties not authorized or invited to know and share that private data by those whose activities were recorded.
- DLC and the PA PUC have not adequately disclosed the particular recording and transmission capabilities of the SK9MIA7 OpenWay (which, according to my most recent understanding, is the smart meter DLC wishes to install at my Property), or the extent of the data that will be recorded, stored, and shared—or the purposes for which the data will and will not be used.

24-25. No response necessary.

26. DLC Counsel's statement: Duquesne Light contends that Complainant should be required to produce the documents requested in Discovery Request No. 6 because Complainant has alleged that Duquesne Light's smart meters pose a fire hazard. Any evidence in Complainant's possession, custody, or control that she believes support [sic] this claim is directly relevant to this case and must be produced to Duquesne Light.

ANSWER:

As I stated in my initial response to Discovery Request No. 6, DLC's request is premature. I am in the process of gathering information and facts that support my claim. DLC's answers to my interrogatories will help inform additional facts that support my claim. But I could never gather and produce "all" Documents that support my claim because so much such information exists—some of which is unavailable to me. I will do my best, but this is why I called DLC's Discovery Request No. 6 "overly burdensome to the point of impossibility."

As Your Honor can see in DLC Counsel's Exhibit B, I included the following in my response: "Abundant evidence that smart meters have caused house fires exists, including court records and news stories that are publicly available and can be accessed by DLC without my intervention ... The following list includes a few of the reasons I believe the installation of a smart meter on my home poses a fire hazard, increasing the risk of damage to my Property and jeopardizing my physical safety.

- Thousands of fires involving burned and/or exploded smart meters have been documented in PA, CA, TX, FL, NV, IL, MI, and across Canada. These fires have caused property damage and fatalities.
- In our own state of Pennsylvania, for example, installation of Sensus smart meters was halted in 2012 after a spate of “overheating”-related house fires.”

27-28. No response necessary.

29. DLC Counsel’s statement: Duquesne Light contends that Complainant should be required to respond to the question set forth in Discovery Request No. 16 because Complainant has alleged that radiofrequency radiation allegedly emitted from Duquesne Light’s smart meters will negatively affect her health, and Duquesne Light is entitled to know if Complainant is regularly exposed to radiofrequency radiation from other sources, including cell phones, microwave ovens, wireless internet, and Wi-Fi routers.

ANSWER:

I refute DLC’s contention that I should “be required to respond to the question set forth in Discovery Request No. 16.” To begin with, Discovery Request No. 16 is not a question at all but rather a demand to grant DLC access to more of my personal information. Providing detailed information such as “the type (with make and model)” about “devices, appliances, and equipment used in [my] home or by [me] in [my] daily life” in a document that is destined for the public record may compromise the safety and security of my home. After all, DLC specifically wants details on any of my possessions “that produce radio frequency or low frequency fields,” which unknown third parties could infiltrate if they had the skill and desire to do so. The information DLC seeks in Discovery Request No. 16 is among the information I do not want DLC or other utility companies collecting about me and sharing—knowingly or unknowingly—with third parties. I note that if DLC achieves their desired outcome of forcing the installation of a smart meter on my Property, they will gain access to this information. DLC has no right to access granular information about my daily activities without my consent.

Furthermore, as stated in my response to DLC Counsel’s statement in paragraph 20 above, I am not claiming to have suffered health effects from a smart meter that has been installed on my Property because no smart meter has been installed on my Property. Discovery Request No. 16 would make more logical sense if I were claiming to have suffered health effects from a smart meter DLC installed on my Property, and DLC sought to prove the health effects I specified could have been caused instead by other sources “that produce radio frequency or low frequency fields.”

But it seems to me that DLC is not seeking to avoid legal responsibility for health effects I did not claim to have suffered as a result of actions they have not yet taken. DLC seeks this information for a different reason. I contend that DLC could only use the information they seek in Discovery Request No. 16 to make the following fallacious argument: “Complainant willingly exposes herself to x V/m of RF radiation; therefore,

DLC should be permitted to expose Complainant to an additional x V/m of RF radiation without her consent.” The numerical value of either “ x ” in this hypothetical argument is irrelevant to the extent that DLC seeks to introduce RF radiation into my home *without my consent*. Regardless of whether the amount of RF radiation from my “devices, appliances, and equipment” turned out to be low or high, DLC is seeking permission from the PA PUC to install a smart meter on my Property against my wishes under threat of discontinuing my utility service. Besides, numerous studies refute DLC’s claims that smart meters emit a lower amount RF radiation than many common household “devices, appliances, and equipment.”

Apart from the issue of RF radiation, smart meters produce conducted emissions on all household wiring (commonly referred to as dirty electricity, but technically referred to as harmonics and transients) and other sorts of distortions of a clean sine wave that electric utilities are required to deliver to their customers. I will discuss these in my hearing and will ask DLC about these in my interrogatories to them. Based on my current understanding, some “device[s], appliance[s], or equipment” commonly found in households may produce dirty electricity—but smart meters alone violate the requirement that electric utilities must deliver a clean sine wave to their customers.

In addition, providing the information sought in Discovery Request No. 16 would not address crucial differences between any “devices, appliances, and equipment used by [me] in [my] home or in [my] daily life” and the Itron SK9AMI7 HW 3.1 OpenWay CENTRON Singlephase Smart Meter. To the extent it is even possible to do so, accounting for these differences would require me to provide additional personal information about my “daily life” and habits and I am not amenable to doing so.

Furthermore, providing the information DLC requests and the additional information I have mentioned regarding these products of which I have ownership and control opens the door to even more intrusive lines of inquiry about my “daily life” and habits, such as Discovery Request No. 17.

30-31. No response necessary.

32. DLC Counsel’s statement: Duquesne Light contends that Complainant should be required to respond to Discovery Request No. 17 because the requested information is not privileged and is relevant to this case. Complainant has placed her health at issue in her Complaint. If she regularly uses a cell phone that emits radiofrequency radiation, it makes it less likely that she can prove that any negative health effects allegedly associated with radiofrequency radiation are caused by Duquesne Light’s smart meters as opposed to her cell phone or other devices that emit radiofrequency radiation. Duquesne Light is entitled to know how frequently Complainant uses her cell phone, and that is the purpose of the request set forth in Discovery Request No. 16 [sic].

ANSWER:

I refute DLC's contentions that I should "be required to respond to Discovery Request No. 17," that the requested information is "relevant to this case," and that "Duquesne Light is entitled to know how frequently Complainant uses her cell phone." DLC avers that "[i]f [I] regularly [use] a cell phone that emits radiofrequency radiation, it makes it less likely that [I] can prove that any negative health effects allegedly associated with radiofrequency radiation are caused by Duquesne Light's smart meters as opposed to [my] cell phone or other devices that emit radiofrequency radiation." As I have repeatedly stated, I am not claiming to have suffered "negative health effects allegedly associated with radiofrequency radiation" from a smart meter that has been installed on my Property because no smart meter has been installed on my Property. Discovery Request No. 17 would make more logical sense if I were claiming to have suffered health effects from a smart meter DLC installed on my Property, and DLC sought to prove the health effects I specified could have instead been caused by my use of a cell phone. But I am making no such claim, and Discovery Request No. 17 is irrelevant.

It seems to me that DLC is not seeking to avoid legal responsibility for health effects I did not claim to have suffered as a result of actions they have not yet taken. DLC seeks this information for a different reason. I contend that DLC could only use the information they seek in Discovery Request No. 17 to make the following fallacious argument: "Complainant willingly exposes herself to x V/m of RF radiation; therefore, DLC should be permitted to expose Complainant to an additional x V/m of RF radiation without her consent." The numerical value of either " x " in this hypothetical argument is irrelevant to the extent that DLC seeks to introduce RF radiation into my home *without my consent*. Regardless of whether the amount of RF radiation exposure I receive from a cell phone turned out to be low or high, DLC is seeking permission from the PA PUC to install a smart meter on my Property against my wishes under threat of discontinuing my utility service.

Apart from the issue of RF radiation, smart meters produce conducted emissions on all household wiring (commonly referred to as dirty electricity, but technically referred to as harmonics and transients) and other sorts of distortions of a clean sine wave that electric utilities are required to deliver to their customers. I will discuss these in my hearing and will ask DLC about these in my interrogatories to them. Based on my current understanding, some "device[s], appliance[s], or equipment" commonly found in households may produce dirty electricity—but smart meters alone violate the requirement that electric utilities must deliver a clean sine wave to their customers.

In addition, providing the information sought in Discovery Request No. 17 would not address crucial differences between any use of a cell phone by me and constant, imposed exposure to the Itron SK9AMI7 HW 3.1 OpenWay CENTRON Singlephase Smart Meter. To the extent it is even possible to do so, accounting for these differences would require me to provide additional personal information about my "daily life" and habits and I am not amenable to doing so.

Discovery Request No. 17 is not only irrelevant, but unnecessarily intrusive. The information DLC seeks in Discovery Request No. 17 is among the information I do not want DLC or other utility companies collecting about me and sharing—knowingly or unknowingly—with third parties. Providing the detailed information requested by DLC in a document that is destined for the public record will compromise my privacy. Furthermore, DLC specifically wants details on any of my possessions “that produce radio frequency or low frequency fields,” which unknown third parties could infiltrate if they had the skill and desire to do so. DLC has no right to access granular information about my daily activities without my consent.

33-34. No response necessary.

35. DLC Counsel's statement: Duquesne Light contends that Complainant should be required to respond to Discovery Request No. 18 because, as explained in paragraph 29 of this Motion, if Complainant has other devices, appliances, or equipment in her home that emit radio frequency or low frequency fields—such as cell phones, microwave ovens, wireless internet, and Wi-Fi routers—that makes is [sic] less likely that she can establish that any negative health effects that she allegedly experiences due to radio frequency radiation can be attributed to Duquesne Light’s smart meters as opposed to some other devices. Duquesne Light is seeking to obtain all documents—including but not limited to user manuals and instructional manuals—relating to each of these devices that are in Complainant’s home so that Duquesne Light can determine how much radiofrequency each product emits. This information is not privileged and is relevant to this case, and Duquesne Light should be permitted to obtain it.

ANSWER:

I refute DLC’s contentions that I should “be required to respond to Discovery Request No. 18,” that the requested information is “relevant to this case,” and that “Duquesne Light should be permitted to obtain” “all documents—including but not limited to user manuals and instructional manuals—relating to each of these devices that are in Complainant’s home.” DLC avers that “[i]f [I] [have] other devices, appliances, or equipment in [my] home that emit radiofrequency radiation, it makes is [sic] less likely that [I] can establish that any negative health effects that [I] allegedly [experience] due to radio frequency radiation can be attributed to Duquesne Light’s smart meters as opposed to some other devices.” Again, I am not “allegedly [experiencing]” “negative health effects due to radio frequency radiation” from a smart meter that has been installed on my Property because no smart meter has been installed on my Property. Discovery Request No. 18 would make more logical sense if I were claiming to have suffered health effects from a smart meter DLC installed on my Property, and DLC sought to prove the health effects I specified could have instead been caused by my use of “some other devices.” But I am making no such claim, and Discovery Request No. 18 is irrelevant.

It seems to me that DLC is not seeking to avoid legal responsibility for health effects I did not claim to have suffered as a result of actions they have not yet taken. DLC seeks this information for a different reason. I contend that DLC could only use the information they seek in Discovery Request No. 18 to make the following fallacious argument: “Complainant willingly exposes herself to x V/m of RF radiation; therefore, DLC should be permitted to expose Complainant to an additional x V/m of RF radiation without her consent.” The numerical value of either “ x ” in this hypothetical argument is irrelevant to the extent that DLC seeks to introduce RF radiation into my home *without my consent*. Regardless of whether the amount of RF radiation exposure I receive from “some other devices” turned out to be low or high, DLC is seeking permission from the PA PUC to install a smart meter on my Property against my wishes under threat of discontinuing my utility service.

Apart from the issue of RF radiation, smart meters produce conducted emissions on all household wiring (commonly referred to as dirty electricity, but technically referred to as harmonics and transients) and other sorts of distortions of a clean sine wave that electric utilities are required to deliver to their customers. I will discuss these in my hearing and will ask DLC about these in my interrogatories to them. Based on my current understanding, some “device[s], appliance[s], or equipment” commonly found in households may produce dirty electricity—but smart meters alone violate the requirement that electric utilities must deliver a clean sine wave to their customers.

In addition, providing the information sought in Discovery Request No. 18 would not address crucial differences between using “some other devices” and constant, imposed exposure to the Itron SK9AMI7 HW 3.1 OpenWay CENTRON Singlephase Smart Meter. To the extent it is even possible to do so, accounting for these differences would require me to provide additional personal information about my “daily life” and habits and I am not amenable to doing so.

Discovery Request No. 18 is not only irrelevant, but unnecessarily intrusive to the extent that it reveals the same information as Discovery Request Nos. 16 and 17. I do not want DLC or other utility companies collecting that information about me and sharing it—knowingly or unknowingly—with third parties. Providing the detailed information requested by DLC in a document that is destined for the public record will compromise my privacy. Furthermore, DLC specifically wants details on any of my possessions “that produce radio frequency or low frequency fields,” which unknown third parties could infiltrate if they had the skill and desire to do so. DLC has no right to access granular information about my daily activities without my consent.

36-37. No response necessary.

38. DLC Counsel’s statement: Duquesne Light contends that Complainant should be required to respond to Discovery Request No. 27 because Complainant has alleged that she will suffer negative health effects if Duquesne Light installs a smart meter at the Property. Duquesne Light therefore is entitled to know which specific medical conditions

make Complainant vulnerable to, or that would be aggravated by, the installation of a smart meter by Duquesne Light. This information is not privileged and is relevant to this case because Complainant has placed her health at issue. Duquesne Light is willing to enter into a confidentiality agreement with Complainant to protect her hospital and medical records.

ANSWER:

I again refute DLC's contention that they are "entitled to know" my personal medical information. As I previously stated in paragraph 20, I am not claiming to be highly sensitive to radiofrequency (RF) radiation from smart meters or to be a member of an especially vulnerable group. Therefore, my "hospital and medical records" contain no information that "is relevant to this case" in general or to Discovery Request No. 27 in particular.

Neither I nor my close friends and family members who fall into vulnerable classes of individuals (e.g., the elderly, the very young) should be forced to have suffered damage to our health in order to have the opportunity to challenge the installation of a smart meter at my home.

DLC contends that the information they seek "is not privileged." But I have already explained why I refute this contention. My medical information is privileged and unrelated to my Formal Complaint.

DLC is asking Your Honor to compel me to disclose my own confidential information to them even though I am not planning to introduce any of it into these proceedings to bolster my claims. I respectfully ask Your Honor to deny their request.

39-40. No response necessary.

38. DLC Counsel's statement: Duquesne Light contends that Complainant should be required to respond to Discovery Request No. 28 because Complainant has alleged that she will suffer negative health effects if Duquesne Light installs a smart meter at the Property. Duquesne Light thus is entitled to obtain any evidence that supports this allegation, including Complainant's hospital or medical records that demonstrate that she suffers from the medical conditions that she claims will be negatively affected by the installation of a smart meter by Duquesne Light at the Property. Duquesne Light is willing to enter into a confidentiality agreement with Complainant to protect her hospital and medical records.

ANSWER:

See response to DLC Counsel's statement regarding Discovery Request No. 27, which can be found in paragraph 38.

1.36 Verification

Verification

I, Miranda Grace Edwards, hereby state that the facts above set forth are true (or 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. section 4904 (relating to unsworn falsification to authorities).

12/17/18

Date

mg

Signature

42-43. No response necessary.

44. DLC Counsel's statement: Duquesne Light contends that Complainant should be required to respond to Discovery Request No. 29 because Complainant has alleged that her health will be negatively affected if Duquesne Light installs a smart meter at the Property. Duquesne Light is therefore entitled to receive any evidence, including hospital and/or medical records and studies, demonstrating that a health condition that Complainant claims to suffer from will be impaired by the installation of a smart meter by Duquesne Light.

ANSWER:

See response to DLC Counsel's statement regarding Discovery Request No. 27, which can be found in paragraph 38.

WHEREFORE, Complainant Miranda Grace Edwards respectfully requests that the Commission deny Duquesne Light Company's Motion to Compel Discovery Responses.

Respectfully submitted,



Miranda Grace Edwards

December 17, 2018

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MIRANDA GRACE EDWARDS,

Complainant,

vs.

DUQUESNE LIGHT COMPANY,

Respondent.

No. C-2018-3002741

CERTIFICATE OF SERVICE

I, Miranda Grace Edwards, hereby certify that I have this day served a true copy of my Response to Respondent's Motion to Compel Discovery Responses upon the participant listed below in accordance with the requirements of 52 PA. Code § 1.54 (relating to service by a participant):

VIA EMAIL:

Paul Shane Miller, Esquire
PA I.D. No. 319174
smiller@tuckerlaw.com
Jeremy V Farrell, Esquire
PA I.D. No. 316258
jfarrell@tuckerlaw.com
1500 One PPG Place
Pittsburgh, PA 15222
Fax: 412-594-5619

Dated this 17th day of December, 2018



Miranda Grace Edwards

msea.mdew@gmail.com
3835 Acorn Street
Pittsburgh, PA 15207

