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FEB 4 - 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

CONCHITA M BRAUN

1220 Parkside Drive South
Reading, PA 19611

610 /375-3501

conchitabraun@yahoo.com

February 4th 2019

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street 2nd Floor
Harrisburg, PA 17120

RE: Conchita M Braun vs. Metropolitan Edison Company
Docket No. C-2018-3003001

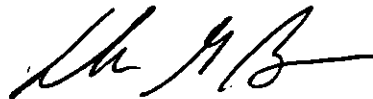
Dear Secretary Chiavetta:

Please find enclosed my Motion to bar the testimony of the Metropolitan Edison Company's three (3) proposed expert witnesses.

This Motion has been filed with the Honorable Administrative Law Judge, Jeffrey Watson and copies sent to the Company.

Feel free to contact me if you have any questions in regards to this matter.

Sincerely,



Conchita M Braun

CONCHITA M BRAUN

1220 Parkside Drive South
Reading, PA 19611

610 /375-3501

conchitabraun@yahoo.com

February 4th, 2019

Commonwealth of Pennsylvania
Administrative Law Judge Jeffrey A Watson
301 5th Avenue, Suite 220, Platt Place
Pittsburgh, PA 15222

**RE: Conchita M Braun vs. Metropolitan Edison Company
Docket No. C-2018-3003001**

Dear Judge Watson,

Please find enclosed my Motion to bar the testimony of Metropolitan Edison Company's three (3) proposed expert witnesses.

Copies of this Motion are being sent to Secretary Rosemary Chiavetta and to Metropolitan Edison Company.

Feel free to contact me if you have any questions in regards to this matter.

Sincerely,



Conchita M Braun.

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CONCHITA M BRAUN :
 :
 : **Docket No. C-2018-3003001**
 :
 v. :
 :
 METROPOLITAN EDISON :
 COMPANY :

**MOTION TO BAR THE TESTIMONY OF THE
METROPOLITAN EDISON COMPANY'S THREE (3) PROPOSED
EXPERT WITNESSES.**

On January 28th, 2019, I received a letter from Metropolitan Edison Company (also here referred to as "Met-Ed" or "the Company"), naming three expert witnesses that they intend to present at a future hearing to be scheduled in the above-captioned matter, Dr Christopher C. Davis, PH D., Dr Mark Israel, M.D. and John Ahr.

This letter was dated January 10th, which was the deadline issued by the Litigation Schedule order. Metropolitan Edison Company included a certificate of service, certifying that the documents were served upon me via First Class Mail, on January 10th.

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

I received the documents mentioned, on January 28th. The stamped envelope clearly shows the date of January 24th. (See copies of letters and envelop enclosed) Therefore Metropolitan Edison Company not only failed to meet the litigation schedule deadline, but furthermore, they falsely filed a certificate of service. Making such false statements should have consequences, as it is fraud against the Court.

On their letter addressed to ALJ Jeffrey Watson, Metropolitan Edison Company states:

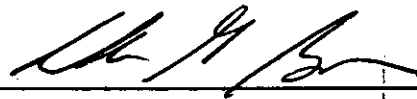
“In accordance with the Prehearing Order issued by you on December 3, 2018, please be advised that Metropolitan Edison Company (“Met-Ed” or “The Company”) intends to present three expert witnesses,…”

According to my records, the order your Honor issued on December 3rd, 2018, was to Grant Met-Ed's Motion to Compel me to answer the responses to the Interrogatories issued by Met-Ed, giving me a deadline of December 21st 2018, to do so.

The order you gave in this matter, with the Litigation Schedule deadlines, first one being for Jan 10th 2019, was issued by your Honor on October 15th, 2018, not December 3rd, 2018 as stated by the Company.

For these reasons, failing to meet the litigation schedule deadline and issuing a false certificate of service, I respectfully request that the testimony of these three witnesses be barred.

FURTHER. In addition I respectfully request that the proper sanctions be imposed against Metropolitan Edison Company for falsely filing a certificate of service. 52 Pa Code § 5.372, provides that the presiding officer may impose appropriate sanctions upon a party found to be found in violation of the obligations set forth in the Commission's regulations.



Conchita M Braun
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conchitabraun@yahoo.com

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FEB 4 - 2019

FirstEnergy.

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

2800 Pottsville Pike
PO Box 16001
Reading, PA 19612-6001

Tori L. Giesler, Esq
(610) 921-6658
(330) 315-9263 (Fax)

610-929-3601

January 10, 2019

VIA EMAIL AND FIRST CLASS MAIL

Administrative Law Judge Jeffrey A. Watson
Pennsylvania Public Utility Commission
Office of Administrative Law Judge
Piatt Place, Suite 220
301 5th Street
Pittsburgh, PA 15222

Re: Conchita M. Braun v. Metropolitan Edison Company
Docket No. C-2018-3003001

Dear Judge Watson:

In accordance with the Prehearing Order issued by you on December 3, 2018, please be advised that Metropolitan Edison Company ("Met-Ed" or "the Company") intends to present three expert witnesses, Dr. Christopher C. Davis, Ph.D., Dr. Mark Israel, M.D., and John Ahr at a future hearing to be scheduled for the above-captioned matter. The name, address and summaries of the Company's expert witnesses are attached.

Met-Ed reserves the right to add additional witnesses based upon the list provided by the Complainant.

Copies are being provided in accordance with the Certificate of Service. Should you have any questions or concerns regarding this information, please feel free to contact me.

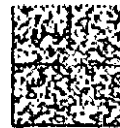
Very truly yours,

Tori L. Giesler

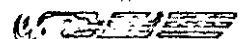
FirstEnergy.

2800 Pottsville Pike
PO Box 16001
Reading, PA 19612-6001

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Conchita M. Braun
1220 Parkside Drive South
Reading, PA 19611

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1/10/19*



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FEB 4 - 2019

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

CONCHITA M. BRAUN

v.

METROPOLITAN EDISON COMPANY

Docket No. C-2018-3003001

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the aforementioned documents upon the individual listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by First Class Mail, postage prepaid, as follows:

Conchita M. Braun
1220 Parkside Drive South
Reading, PA 19611

Dated: January 10, 2019

Tori L. Giesler

Lauren M. Lepkoski
Tori L. Giesler
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, Pennsylvania 19612-6001
(610) 921-6203
(610) 921-6658

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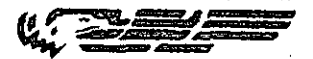
FirstEnergy

2800 Pottsville Pike
P.O. Box 16001
Reading, PA 19612-6001

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Conchita M. Braun
1220 Parkside Drive South
Reading, PA 19611

*Received
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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

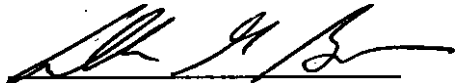
CONCHITA M BRAUN :
 :
 v. : **Docket No. C-2018-3003001**
 :
METROPOLITAN-EDISON
COMPANY :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the
aforementioned documents upon the individual/s listed below, in accordance
with the requirements of 52 Pa. Code (relating to service by a participant).

Service by Certified Mail as follows:

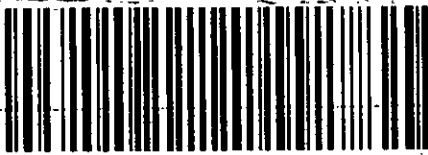
Lauren M. Lepkoski
Tori L Giesler
First Energy Service Company
2800 Pottsville Pike
P.O. BOX 16001
Reading, PA 19612-6001


Conchita M Braum
1220 Parkside Drive South
Reading, PA 19611
(610) 375-3501

Dated February 4th 2019

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SECRETARY'S BUREAU

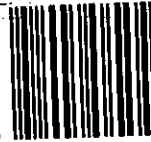
Conchita Braun
1220 Parkside Dr. S.
Reading, PA 19611



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Rosemary Ciavetta
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street 2nd Floor
Harrisburg, PA 17120

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