



ATTORNEYS AT LAW

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 www.hmslegal.com

Thomas J. Sniscak
(717) 703-0800
tjsniscak@hmslegal.com

Kevin J. McKeon
(717) 703-0801
kjmckeon@hmslegal.com

Whitney E. Snyder
(717) 703-0807
wesnyder@hmslegal.com

April 19, 2019

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Filing Room
Harrisburg, PA 17120

Re: Meghan Flynn, et al. v. Sunoco Pipeline L.P.; Docket Nos. C-2018-3006116 and P-2018-3006117;

Melissa DiBernardino v. Sunoco Pipeline L.P.; Docket No. C-2018-3005025

Rebecca Britton v. Sunoco Pipeline L.P.; Docket No. C-2019-3006898

Laura Obenski v. Sunoco Pipeline L.P.; Docket No. C-2019-3006905

SUNOCO PIPELINE L.P.'S PREHEARING CONFERENCE MEMORANDUM

Dear Secretary Chiavetta:

Attached for electronic filing with the Commission is Sunoco Pipeline L.P.'s Prehearing Conference Memorandum in the above-referenced proceedings.

If you have any questions regarding this filing, please contact the undersigned.

Very truly yours,

Thomas J. Sniscak
Thomas J. Sniscak
Kevin J. McKeon
Whitney E. Snyder
Counsel for Sunoco Pipeline L.P.

WES/das

Enclosure

cc: Hon. Elizabeth H. Barnes (Electronic ebarnes@pa.gov and first class mail)
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MEGHAN FLYNN	:	
ROSEMARY FULLER	:	
MICHAEL WALSH	:	
NANCY HARKINS	:	
GERALD MCMULLEN	:	
CAROLINE HUGHES and	:	
MELISSA HAINES	:	
Complainants,		Docket Nos. C-2018-3006116 P-2018-3006117
v.		
SUNOCO PIPELINE L.P.,	:	
<u>Respondent.</u>		
MELISSA DIBERNARDINO,	:	
Complainant,		Docket No. C-2018-3005025
v.		
SUNOCO PIPELINE L.P.,	:	
<u>Respondent.</u>		
REBECCA BRITTON,	:	
Complainant,		Docket No. C-2019-3006898
v.		
SUNOCO PIPELINE L.P.,	:	
<u>Respondent.</u>		
LAURA OBENSKI,	:	
Complainant,		Docket No. C-2019-3006905
v.		
SUNOCO PIPELINE L.P.,	:	
<u>Respondent.</u>		

**SUNOCO PIPELINE L.P.'S
PREHEARING CONFERENCE MEMORANDUM**

TO THE HONORABLE ELIZABETH H. BARNES

Pursuant to 52 Pa. Code § 5.222(d) and Your Honor's March 20, 2019 Order, Sunoco Pipeline L.P. (SPLP) submits this prehearing conference memorandum.

A. SERVICE

SPLP requests that each of the below attorneys be included on electronic service of documents in this proceeding.

Thomas J. Sniscak, Attorney I.D. # 33891
Kevin J. McKeon, Attorney I.D. # 30428
Whitney E. Snyder, Attorney I.D. # 316625
Hawke McKeon & Sniscak, LLP
100 North Tenth Street
Harrisburg, PA 17101
(717) 236-1300
tjsniscak@hmslegal.com
kjmckeon@hmslegal.com
wesnyder@hmslegal.com

Robert D. Fox, Esq. (PA ID No. 44322)
Neil S. Witkes, Esq. (PA ID No. 37653)
Diana A. Silva, Esq. (PA ID No. 311083)
MANKO GOLD KATCHER & FOX, LLP
401 City Avenue, Suite 901
Bala Cynwyd, PA 19004
Tel: (484) 430 5700
rfox@mankogold.com
nwitkes@mankogold.com
dsilva@mankogold.com

SPLP requests that the official service list in this proceeding be updated to include each of these attorneys.

SPLP also requests that all documents filed in this proceeding be electronically served in addition to any hard copy service.

B. SETTLEMENT

SPLP is willing to engage in settlement discussions.

C. DISCOVERY

SPLP proposes the following modifications to the Commission's discovery regulations to expedite discovery between the parties to be effective only after the service of the Complainants' and any Aligned Intervenor's Surrebuttal testimony. SPLP proposes to have objections to discovery requests due five (5) days after receipt of requests, that a Motion to Compel be due within five (5) days of service of any objections, and that an answer to a Motion to Compel be due within three (3) days of service of a Motion to Compel. SPLP also respectfully requests that Your Honor rule on the motion in an expedited fashion, ideally within three (3) days of receipt of the answer to the Motion to Compel. This serves the Commission's interest in efficient discovery without causing undue delay.

D. OTHER PROPOSED ORDERS OF DISCOVERY

SPLP does not propose any further modifications to the Commission's discovery regulations.

E. SITE VIEW HEARINGS ARE NOT APPROPRIATE IN THIS COMPLAINT PROCEEDING

This is not a proceeding where a site view is appropriate. Site view hearings are used in proceedings where the Commission must determine whether or not a utility's proposal is in the public interest, and the utility has the burden of proof. Site view hearings are useful where the Commission must determine how the utility's proposal may affect the surrounding area when that

is an issue the Commission can/must consider prior to granting the utility the authority to do what it is requesting to do, such as transmission line siting.

Site view hearings are not appropriate in a complaint proceeding where proximity or pipeline infrastructure existence cannot be a violation of law and cannot be the determining factor in the Commission's decision. Complainants' have the burden of proof to show that SPLP's conduct has violated a statute or regulation. The Commission has very limited authority over siting of pipeline facilities (unlike siting of transmission lines). There has been no specific allegation raised that SPLP's conduct at some particular area has caused an issue where a site visit would be necessary to show whether SPLP has or has not violated the law or a regulation. Instead, site view hearings have been proposed to see facts more akin to those relevant in a transmission line siting case, like how close a facility is to a school or farm and how the facility will impact the landscape solely by its proposed existence. To the extent such facts like distance between a pipeline right-of-way and a school are relevant here, the parties can stipulate to those matters. There is no need for the time and expense of a site view to show a fact that can be ascertained via stipulation. Moreover, to the extent a party wants to prove something via picture, that is easily accomplished by entering photographs into the record as an exhibit. This is not a case where the mere existence and proximity of a pipeline to other structures is a determining issue. The Commission does not have the statutory authority to order a pipeline not be constructed just because it is close to another structure.

F. PROPOSED SCHEDULE FOR TESTIMONY, HEARING, AND BRIEFS

SPLP is considering Complainants' proposed schedule and will work with the parties at the prehearing conference to reach a mutually agreeable schedule. SPLP believes that only slight

modifications are needed to Complainants' proposed schedule to ensure all parties have adequate time to prepare and present their case.

The use of written testimony is proper here for all experts and all witness that are called by a party with counsel, not solely expert witnesses. Complainants' proposed schedule appears to only consider written testimony for experts. SPLP believes, consistent with Commission practice, that only pro se litigants should be allowed to present their own, lay testimony orally. This is consistent with the treatment of pro se litigants at the Commission. SPLP does not object if pro se litigants want to utilize written testimony. However, SPLP does not agree that any witness represented by counsel should proceed with oral testimony, which will exponentially lengthen the time of the hearing and the length and therefore cost of the transcript. SPLP proposes that a hearing for pro se litigants to present their own lay testimony (if they so choose) be held in late 2019, prior to the submission of written testimony.

Complainants proposed schedule for written testimony is unclear as to whether they intend for all parties to file direct testimony at the same time or whether the direct testimony is for Complainants and aligned Intervenors and then the Rebuttal phase is for Respondent and any aligned intervenors. Either way the schedule is interpreted, it requires modification.

First, assuming that the Direct testimony phase is for all parties, having one date for all parties to submit Direct testimony is inconsistent with the Commission's Order of Procedure, 52 Pa. Code § 5.242(a), which requires the party with the burden of proof to open. Here, SPLP cannot predict what Complainants' testimony will contain and would essentially be guessing at what it should present in its testimony. In fact, Flynn Complainants' have not named a single witness other than the seven Complainants even though it has been approximately five months since they filed their Complaint. Complainants' and aligned intervenors should open the case.

Alternatively, if the schedule is intended to have Complainants open and Respondent file Rebuttal testimony, the time frame for Respondent Rebuttal is extremely prejudicial. Complainants will have had approximately 13 months to develop their case, while giving SPLP only 45 days to respond. This is particularly unreasonable given the number of issues in this proceeding, the fact that Complainants repeatedly seek to add issues, and that SPLP will be responding not just to Complainants but also to approximately 15 intervenors.

Either of the defects are easily cured by: (1) specifying that Complainants and Intervenors aligned with Complainants file Direct Testimony and Surrebuttal Testimony while SPLP and Intervenor Range Resources file Rebuttal Testimony and Rejoinder outlines; and (2) extending the time period between Direct and Rebuttal from 45 days to 90 days and pushing the remainder of the schedule back 45 days.

Another defect in the schedule that fails to conform to Commission practice is closing discovery prior to testimony. Part of the reason written testimony is utilized in sequential phases is to allow the parties to obtain discovery concerning each other's testimony for use in their responsive testimony and/or for cross-examination. Lack of discovery concerning expert testimony will unnecessarily lengthen the time needed for cross-examination and results in a lack of exchange of information on issues that can often narrow the points on which the parties disagree. SPLP believes discovery should, consistent with Commission practice, continue throughout the testimony phases and has proposed discovery modifications above that account for the shorter time period between the later phases of testimony.

Given that Flynn Complainants' and various other parties do not want to file testimony until January 2020, SPLP submits that the parties should be able to reach a mutually agreeable procedure and schedule for submission of testimony and in-person hearings.

G. WITNESSES.

SPLP does not have the burden of proof in this proceeding and it cannot predict what specific witnesses it may need to present to defend against the Amended Complaint until Complainants present their testimony. SPLP entered testimony into the record in various proceedings already addressing the issues raised in this proceeding and may rely on and incorporate such evidence into this proceeding. SPLP identifies preliminarily, as potential witnesses:

1. Mr. Joseph Perez, Vice President, Technical Services, Operations and Engineering Services, Energy Transfer
 - a. Topics: Public awareness, emergency response materials, procedures, and training
2. Mr. Gregory Noll, Principal at GGN Technical Resources, LLC
 - a. Topics: Emergency response materials, procedures, and training.
3. Mr. John Zurcher, Principal at Process Performance Improvement Consultants, LLC (P-PIC), Managing Director at The Blacksmith Group
 - a. Topics: Public awareness, emergency response materials, procedures, and training, and issues regarding pipeline safety
4. Mr. Matthew Gordon, Senior Director of Operations, Energy Transfer and SPLP.
 - a. Topics: Pipeline construction and operations
5. Mr. Mike Rosenfeld
 - a. Topics: Pipeline integrity
6. Mr. C. Gus Borkland, Vice President of Emergency Planning/Remediation & Security, Energy Transfer

- a. Topics: Emergency planning/remediation, security, geology
- 7. Sam Ariaratnam, Professor and Program Chair of Construction Engineering, Arizona State University
 - a. Topics: Horizontal Directional Drilling
- 8. Tim Bechtel, Rettew
 - a. Topics: Geology
- 9. Paul Chrostowski, CPF Assoc.
 - a. Topics: Wells and water
- 10. Glen Renschler, Wiss, Janey, Elstner, Assoc. Inc.
 - a. Topics: Structural Engineering
- 11. David Demko, GES
 - a. Topics: Geology
- 12. Richard Voith, Econsult Solutions, Inc.
 - a. Topics: Economic impacts of Mariner Projects
- 13. Peter Angelides, Econsult Solutions, Inc.
 - a. Topics: Economic impacts of Mariner Projects
- 14. Steve Compton, Tetra Tech
 - a. Topics: Pipeline routing
- 15. Gregory Crooks, Principal, Environmental Services, Stantec Consulting Ltd.
 - a. Topics: Plume modeling
- 16. Larry Gremminger, Vice President – EH&S, Energy Transfer
 - a. Geology
- 17. Gina Greenslate, Manager – Public Awareness, Energy Transfer

a. Public awareness, outreach, and emergency preparedness

18. Richard Billman, Vice President – Business Development, Energy Transfer

a. Economic and financial impacts

19. Harry Alexander, Senior Vice President – Production Trading and Marketing and Business Development, Energy Transfer

a. Economic and financial impacts

20. Richard Dalasio, Senior Manager – Pipeline Integrity, Energy Transfer

a. Pipeline integrity

21. Jamie Fye, Project Manager, Michels Corporation

a. Pipeline construction

22. Jay Dresh, Director – Liquid Technical Operations, Energy Transfer

a. Pipeline integrity

23. Mark McConnell, Project Manager – Field Services, Percheron

a. Contacts with landowners

24. Potential Additional Witnesses Regarding Emergency Planning for Schools and Communities

25. Potential Additional Witnesses Regarding Corrosion

SPLP will identify additional witnesses as necessary to respond to the witnesses and evidence submitted by Complainants. Depending upon Complainants' testimony, SPLP reserves the right to identify and submit other witnesses subject to the form and time of presentation.

Each of these witnesses may present testimony regarding any of the above-stated issues or any other issue that may arise during the course of this proceeding. SPLP reserves the right to adopt any testimony of other witnesses, in whole or in part, to substitute witnesses, and to offer

additional witnesses and exhibits as may be necessary, including but not limited to witnesses and evidence to address the testimony, exhibits, or evidence that may be presented by any party in this proceeding.

H. ISSUES

1. Consolidation of Complaints

SPLP moved to consolidate the Flynn Complaint with similar complaint proceedings that pro se complainants Britton, Obenski, and DiBernardino initiated. SPLP after reviewing various answers to its Motion to Consolidate believes consolidation is appropriate.

2. Petitions to Intervene

The following Petitions to Intervene have not yet been decided upon:

- West Chester Area School District,
- Chester County,
- Thornbury Township,
- Edgmont Township, and
- Senator Thomas Killion

SPLP opposes each Petition to Intervene as described in each Answer Opposing Petition to Intervene respectively.

3. Protective Order

On April 17, 2019, SPLP filed a Motion for Amended Protective Order. SPLP, as discussed in that Motion, believes it should be granted to provide for an additional category of heightened protection for extremely sensitive confidential security information. SPLP will use good faith best efforts to limit the amount of materials subject to such protection and the proposed amended protective order provides a procedure for challenging the designation of materials.

SUBSTANTIVE ISSUES

Complainants have the burden of proof in this proceeding to show that SPLP is in violation of law or a Commission regulation that has a discernable effect on Complainants, over which this Commission has jurisdiction. Complainants must prove that SPLP violated the law or regulations within the three-year statute of limitations¹ to obtain any relief, injunction or otherwise.² SPLP reserves its right to address additional issues as they may arise during this proceeding. SPLP's position will be finalized in its evidence and briefs submitted under the schedule developed in this proceeding.

SPLP submits that discussion of substantive issues at the prehearing conference is premature, an inefficient use of the parties' time, and will merely result in fruitless and contentious arguments among the parties.

4. Public Awareness/Emergency Preparedness

SPLP is not in violation of any applicable law or regulation concerning public awareness and/or emergency preparedness.

5. Mass Warning Systems

There is no regulatory or legal requirement for SPLP to install or cause to be installed a "mass warning system." Accordingly, SPLP cannot be found in violation of any statute or regulation regarding this topic and the Commission lacks legal authority to order SPLP to install

¹ 66 Pa. C.S. § 3314; *Suburban East Tires, Inc. v. Pennsylvania Public Utility Com'n*, 582 A.2d 727, 729, 136 Pa.Cmwlth. 209, 213 (Pa.Cmwlth., 1990) ("This section thus provides a general limitation period of three years for any action under the Code") (applying three-year statute of limitations to consumer complaint against utility).

² *West Penn Power Co. v. Pa. Pub. Util. Comm'n*, 478 A.2d 947, 949 (Pa.Cmwlth. 1984) ("We hold that in order for the PUC to sustain a complaint brought under this section, the utility must be in violation of its duty under this section. Without such a violation by the utility, the PUC does not have the authority, when acting on a customer's complaint, to require any action by the utility.").

or cause to be installed a “mass warning system.” SPLP notes that to date no party has defined what exactly they intend this phrase to mean.

6. Pipeline Integrity Management

SPLP’s integrity management plans, materials, and execution thereof is not in violation of any law or regulation.

7. Leak Detection Protocols

SPLP is unclear what exactly this topic refers to. 49 C.F.R. § 195.444 referencing API RP 1130 includes requirements regarding computational pipeline monitoring leak detection systems. SPLP is not in violation of any law or regulation regarding leak detection.

8. Remaining Life Study of ME1 and 12” pipeline

SPLP has agreed to conduction a remaining life study of the ME1 pipeline pursuant to a Settlement with the Commission’s Bureau of Investigation and Enforcement at Docket No. C-2018-3006534, which is pending Commission review. There is no regulatory or legal authority to require SPLP to undertake such study involuntarily and SPLP believes the Commission does not have the legal authority to require a remaining life study absent SPLP’s agreement. Regarding the 12-inch pipeline, that pipeline is only intended for use to transport HVLs temporarily until construction of the ME2/2X pipelines is complete. Even if the Commission could order SPLP to undertake a remaining life study of the 12-inch pipeline, given its use for HVLs is intended to be short-term, such study would be pointless.

9. Location of pipelines close to dwellings and public gathering places

Federal regulations that the Commission has incorporated by regulation as the safety standards applicable to SPLP specifically allow for the installation of pipelines close to dwellings

and public gathering places. SPLP is not in violation of any law or regulation regarding the siting of its pipelines.

10. Valve spacing – status of construction of valves

SPLP's placement and construction of valves is not in violation of any law or regulation. SPLP is or will be in the near future constructing valves for the ME2/2X pipelines as those pipeline segments are completed.

11. Horizontal Directional Drilling – status of construction permits, construction activities, etc.

SPLP is currently engaged in construction in various areas of Chester and Delaware Counties as the Department of Environmental Protection has permitted. SPLP is not engaging in construction where it does not have a permit or necessary modification thereto in place from DEP.

I. EVIDENCE

SPLP does not have the burden of proof in this proceeding and it cannot predict what specific evidence it may need to present to defend against the Amended Complaint and/or Complaints until Complainants present their testimony. SPLP entered extensive evidence into the record in various hearings addressing similar issues that the Amended Complaint raises and may rely on that evidence and incorporate it into the record of this proceeding as necessary going forward.

SPLP intends to present the pre-filed testimony of the above-named witnesses along with any exhibits that witness may sponsor to support his or her testimony. SPLP reserves the right to adopt testimony of other witnesses, in whole or in part, to substitute witnesses, and to offer additional witnesses and exhibits, including but not limited to addressing the testimony, exhibits or other evidence that other parties in this proceeding may present.

Respectfully submitted,

Thomas J. Sniscak

Thomas J. Sniscak, Esq. (PA ID No. 33891)
Kevin J. McKeon, Esq. (PA ID No. 30428)
Whitney E. Snyder, Esq. (PA ID No. 316625)
Hawke, McKeon & Sniscak LLP
100 North Tenth Street
Harrisburg, PA 17101
Tel: (717) 236-1300
tjsniscak@hmslegal.com
kjmckeon@hmslegal.com
wesnyder@hmslegal.com

/s/ Robert D. Fox

Robert D. Fox, Esq. (PA ID No. 44322)
Neil S. Witkes, Esq. (PA ID No. 37653)
Diana A. Silva, Esq. (PA ID No. 311083)
MANKO, GOLD, KATCHER & FOX, LLP
401 City Avenue, Suite 901
Bala Cynwyd, PA 19004
Tel: (484) 430-5700

Dated: April 19, 2019

Attorneys for Respondent Sunoco Pipeline L.P.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the forgoing document upon the persons listed below in accordance with the requirements of § 1.54 (relating to service by a party). This document has been filed electronically on the Commission's electronic filing system and served on the following:

VIA ELECTRONIC MAIL AND FIRST CLASS MAIL

Michael S. Bomstein, Esquire
Pinnola & Bomstein
Suite 2126 Land Title Building
100 South Broad Street
Philadelphia, PA 19110
mbomstein@gmail.com

Counsel for Flynn et al. Complainants

Anthony D. Kanagy, Esquire
Garrett P. Lent, Esquire
Post & Schell PC
17 North Second Street, 12th Floor
akanagy@postschell.com
glent@postschell.com

*Counsel for Intervenor
Range Resources – Appalachia LLC*

Margaret A. Morris, Esquire
Reger Rizzo & Darnall LLP
Cira Centre, 13th Floor
2929 Arch Street
Philadelphia, PA 19104
mmorris@regerlaw.com

*Counsel for Intervenor
East Goshen Township*

Rich Raiders, Esquire
Raiders Law
321 East Main Street
Annville, PA 17003
rich@raiderslaw.com

*Counsel for Intervenor
Andover Homeowner's Association, Inc.*

Vincent M. Pompo
Guy A. Donatelli, Esq.
Alex J. Baumler, Esq.
24 East Market St., Box 565
West Chester, PA 19382-0565
vpompo@lambmcerlane.com
gdonatelli@lambmcerlane.com
abaumler@lambmcerlane.com

*Counsel for Intervenors
West Whiteland Township,
Downingtown Area School District,
Rose Tree Media School District*

Leah Rotenberg, Esquire
Mays, Connard & Rotenberg LLP
1235 Penn Avenue, Suite 202
Wyomissing, PA 19610
rotenberg@mcr-attorneys.com

*Counsel for Intervenor
Twin Valley School District*

Mark L. Freed
Curtin & Heefner LP
2005 S. Easton Road, Suite 100
Doylestown, PA 18901
mlf@curtinheefner.com

*Counsel for Intervenor
Uwchlan Township*

David J. Brooman
Richard Sokorai
Mark R. Fischer
High Swartz
40 East Airy Street
Norristown, PA 19404
dbrooman@highswartz.com
rsokorai@highswartz.com
mfischer@highswartz.com

*Counsel for Intervenor
West Goshen Township*

Josh Maxwell
Mayor of Downingtown
4 W. Lancaster Avenue
Downingtown, PA 19335
jmaxwell@downingtown.org

Pro se Intervenor

Stephanie M. Wimer
Senior Prosecutor
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
P.O. Box 3265
Harrisburg, PA 17105-3265
stwimer@pa.gov

*Counsel for Pennsylvania Public Utility
Commission BIE*

James R. Flandreau
Paul, Flandreau & Berger, LLP
320 W. Front Street
Media, PA 19063
jflandreau@pfblaw.com

*Counsel for Intervenor
Middletown Township*

Thomas Casey
1113 Windsor Dr.
West Chester, PA 19380
Tcaseylegal@gmail.com

Pro se Intervenor

Laura Obenski
14 South Village Avenue
Exton PA 19341
ljobenski@gmail.com

Pro se Complainant

Michael Maddren, Esquire
Patricia Sons Biswanger, Esquire
Office of the Solicitor
County of Delaware
Government Center Building
201 West Front Street
Media, PA 19063
MaddrenM@co.delaware.pa.us
patbiswanger@gmail.com

Counsel for County of Delaware

James C. Dalton, Esquire
Unruh Turner Burke & Frees
P.O. Box 515
West Chester, PA 19381-0515
jdalton@utbf.com

*Counsel for West Chester Area School District,
Chester County, Pennsylvania*
Virginia Marcille-Kerslake
103 Shoen Road
Exton, PA 19341
vkerslake@gmail.com

Pro Se Intervenor

James J. Byrne, Esquire
Kelly S. Sullivan, Esquire
McNichol, Byrne & Matlawski, P.C.
1223 N. Providence Road
Media, PA 19063
jjbyrne@mbmlawoffice.com
ksullivan@mbmlawoffice.com

*Counsel for Thornbury Township, Delaware
County* *Counsel for County of Chester*

Michael P. Pierce, Esquire
Pierce & Hughes, P.C.
17 Veterans Square
P.O. Box 604
Media, PA 19063
Mppierce@pierceandhughes.com

Counsel for Edgmont Township

Melissa DiBernardino
1602 Old Orchard Lane
West Chester, PA 19380
lissdibernardino@gmail.com

Pro se Complainant

Rebecca Britton
211 Andover Drive
Exton, PA 19341
rbrittonlegal@gmail.com

Pro se Complainant

Margaret A. Morris, Esquire
Reger Rizzo & Darnall LLP
Cira Centre, 13th Floor
2929 Arch Street
Philadelphia, PA 19104
mmorris@regerlaw.com

Guy A. Donatelli, Esquire
Joel L. Frank, Esquire
Alex J. Baumler, Esquire
Lamb McErlane, PC
24 East Market St., Box 565
West Chester, PA 19382-0565
gdonatelli@lambmcerlane.com
jfrank@lambmcerlane.com
abaumler@lambmcerlane.com

Counsel for PA State Senator Thomas H. Killion

Thomas J. Sniscak
Thomas J. Sniscak, Esquire
Kevin J. McKeon, Esquire
Whitney E. Snyder, Esquire

Dated: April 19, 2019