

BEFORE THE PENNSYLVANIA UTILITY COMMISSION

JASON PAUL

COMPLAINANT

DOCETT#

C2019-3007458

CNX GAS CORP(AKA CNX MAINSTREAM)

RESPONDANT

MOTION FOR RELIEF

WHEREAS THE COMPLAINT DOES SO ASK FOR REIELF UNDER GENERAL SECTION 5.103 MOTIONS FOR REILEF

1. THE COMPLAINT AS^k FOR SUPENSION OF JOHN HALL AND OR HIS PARANT FIRM, PURSUNDANT TO SECTION 1.27.
SECTION 1.27 (3) UNETHICAL CONDUCT
2. WHEREAS THE COMPANT WOULD ASK THE COMMISSION THE REVIEW EXHIBT A AND B TO SEE HANDWRITTEN SIGNTURE ARE SAME JOHN HALL BUT THE REP. LAWAYER IS ANOTHER NOT JOHN HALL.

WHEREAS THE COMPANITNAT FEELS THAT THE CUURENT ACTIONS PROPMT A UNFAIR TREATMENT BY REPONDANT AND ASK THE COMMISSION TO DISBARR THAT FIRM FROM THIS MATTER BEFORE THE COMMISSION

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A handwritten signature in black ink, consisting of a large, stylized initial 'J' followed by a series of loops and a horizontal line extending to the right.

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2019 MAY 30 AM 10:17

PA P.U.C.
SECRETARY'S BUREAU

Dickie McCamey

J.R. Hall
Attorney at Law
Admitted in PA, WV

412-392-5316
Fax: 888-811-7144
jhall@dmclaw.com

April 12, 2019

VIA EXPRESS MAIL
Jason R. Paul
132 Cessna Hill Road
Bowell, PA 15531

RE: Jason R. Paul v. CNX Midstream Partners LP
Our File No.: 394193

Dear Mr. Paul:

We received in the mail a "Debt Settlement Agreement" without any accompanying explanation or letter. We assume you sent this in response to my April 4, 2019 letter asking you to contact me. CNX has not "stolen" anything and cannot agree to sign the Agreement. However, if you are claiming that there are outstanding royalties owed relative to an oil and gas lease, we are certain that we can amicably resolve your complaint.

However, without further information, we cannot fully respond to your complaint. Again, I urge you to contact me at your earliest convenience to discuss this matter. My direct dial is (412) 392-5390.

Thank you for your anticipated cooperation.

Sincerely,


J.R. Hall

EXHIBIT
A

JRH/nlh

19. Wholly absent from Complainant's amended pleading, however, is any averment of fact or reasonable inference therefrom alleging the means by or manner in which CNX violated these regulations.

20. In the absence of any averment of fact reasonably indicating "the act or thing done or omitted to be done" by CNX in contravention of any law or regulation which the PUC has jurisdiction to administer, Complainant's Amended Complaint warrants dismissal pursuant to 52 Pa. Code § 5.101(a)(3).

WHEREFORE, CNX Gas Company LLC respectfully requests the Public Utilities Commission dismiss Complainant's Amended Complaint, in its entirety and with prejudice, pursuant to 52 Pa. Code § 5.101(a)(1). Alternatively, the Amended Complaint should be struck and Complainant required to file a more specific pleading.

Respectfully submitted,

DICKIE, McCAMEY & CHILCOTE, P.C.

By: _____

Rodger L. Puz, Esq.

PA I.D. # 67216

J.R. Hall, Esq.

PA I.D. # 88296

Two PPG Place, Suite 400

Pittsburgh, PA 15222

Counsel for Respondent, CNX Gas Company LLC

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Exhibit B

CONCLUSION

As discussed and demonstrated, the collectively content of Complainant's filings direct that his claims derive from an oil and gas royalty dispute over which the Public Utilities Commission is without jurisdiction.

WHEREFORE, CNX Gas Company LLC respectfully requests the Public Utilities Commission dismiss Complainant's Amended Complaint, in its entirety and with prejudice, pursuant to 52 Pa. Code § 5.101(a)(1). Alternatively, the Amended Complaint should be stricken and Complainant required to file a more specific pleading.

Respectfully submitted,

DICKIE, McCAMEY & CHILCOTE, P.C.

By: 

Rodger L. Puz, Esq.
PA I.D. # 67216
J.R. Hall, Esq.
PA I.D. # 88296

Two PPG Place, Suite 400
Pittsburgh, PA 15222
Tele No.: (412) 281-7272

*Counsel for Respondent,
CNX Gas Company LLC*

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CERTIFICATE OF SERVICE

I, J.R. Hall, Esquire, hereby certify that a true and correct copy of the foregoing was served this 24th day of April, 2019, via First Class U.S. Mail, postage prepaid, upon the following individual identified below:

Jason R. Paul
132 Cessna Hill Road
Boswell, PA 15531
Complainant

DICKIE, McCAMEY & CHILCOTE, P.C.

By 

Rodger L. Puz, Esq.
PA I.D. # 67216
J.R. Hall, Esq.
PA I.D. # 88296

Two PPG Place, Suite 400
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Counsel for Respondent, CNX Gas Company LLC

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Rodger L. Puz, Esq.
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J.R. Hall, Esq.
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Pittsburgh, PA 15222
Tele No.: (412) 281-7272

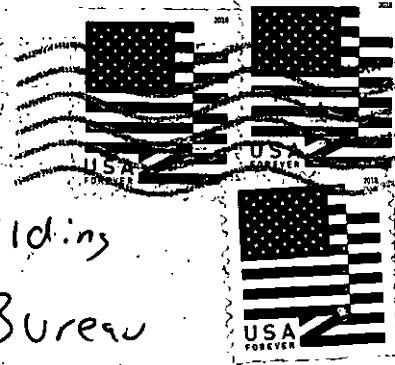
Counsel for Respondent, CNX Gas Company LLC

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Jason Paul
132 Cessna Hill RD
Boswell Pa 15531

JOHNSTOWN PA 159

28 MAY 2019 PM 2 L



~~Commonwealth Keystone Building~~
400 North Street PUC Secretary Bureau
Commonwealth Keystone Building
2nd Floor Room - N201 17120

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