

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION
BUREAU OF INVESTIGATION & ENFORCEMENT

Petitioner

-v-

JOSEPH LEVENTAN
11017 RENNARD STREET
PHILADELPHIA, PA 19116

Respondent

C-2018-3006401

Docket No.: 2016-01959

ANSWER TO COMPLAINT WITH NEW MATTER

Joseph Leventan, Pro-Se, hereby responds to Complaint as follows:

1. Denied and leaves Petitioner to their proof.
2. Admitted.
3. Admitted.

4. Denied and leaves Petitioner to their proof. Respondent provided Petitioner with

evidence of commercial automobile policy declaration insurance coverage through AIC (Agency Insurance Company of Maryland, Inc.) which was operational for the term of the policy.

5. Denied and leaves Petitioner to their proof. Respondent provided Petitioner with evidence of commercial automobile policy declaration insurance coverage through AIC (Agency Insurance Company of Maryland, Inc.) which was operational and was maintained by Respondent for the term of the policy.

NEW MATTER

6. Petitioner's complaint fails to state a claim against this Respondent upon which relief may be granted.

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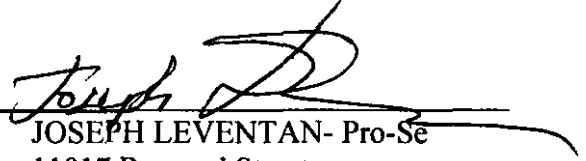
JUN 28 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

7. Petitioner's claims are barred by venue.
8. Petitioner's claims are limited and/or barred by the doctrines of Estoppel, Promissory Estoppel or Equitable Estoppel.
9. All causes of actions and/or claims asserted against answering Respondent are barred by the applicable Statute of Limitations.
10. Any claim against Respondent is barred by waiver.
11. Any claim against Respondent is barred by laches.
12. Any claim against Respondent is or may be barred by specific performance.
13. No act, non-compliance, or omission of the Respondent caused the violations, loss or damages to Petitioner as alleged in Petitioner's complaint, if any.
14. Any claim against Respondent is barred by Petitioner's failure to give proper notice under the laws and statutes of the Commonwealth of Pennsylvania.
15. Petitioner's cause of action and any damages or non-compliance claimed by Petitioner were caused in whole or in part by individuals and/or entities over whom answering Respondent has no control or duty to control.
16. Respondent complied with all the requirements of Petitioner, whether arising from common law, statute, ordinance, contract, tort, or otherwise.
17. Any claim against Respondent is barred by waiver.
18. Respondent did not commit any breach or violation as alleged in the complaint.
19. Any claim against Respondent is barred by Petitioner's failure to give proper notice under the laws and statutes of the Commonwealth of Pennsylvania.

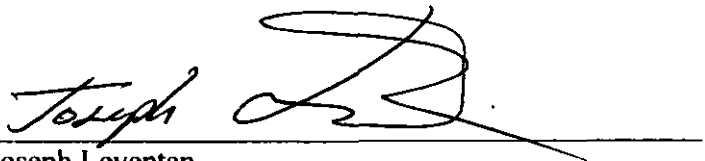
WHEREFORE, Defendant demands judgment in his favor, together with costs against all parties, along with such other relief as this Honorable Court deems appropriate.

DATED: 06/27/19

By: 
JOSEPH LEVENTAN- Pro-Se
11017 Rennard Street
Philadelphia, PA 19116
215-519-5364

VERIFICATION

I verify that the statements made in this Petition are true and correct as to my personal knowledge, information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. Sec. 4904, relating to unsworn falsification to authorities.



Joseph Leventan

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SECRETARY'S BUREAU

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JOSEPH LEVENTAN
11017 RENNARD STREET
PHILADELPHIA, PA 19116

Respondent

Docket No.: 2016-01959

CERTIFICATE OF SERVICE

On June 28, 2019, Respondent, Joseph Leventan, served an original Answer and New Matter to Petitioner's Complaint upon the following party in the above-captioned matter via U.S. Mail next day service:

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

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU


and a copy of same mailed to Mr. Swindler via email RA-PCCmplntResp@pa.gov, and U.S.

Mail next day service:

Michael L. Swindler, Deputy Chief Prosecutor
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
400 North Street
Harrisburg, PA 17120

DATED: 06/27/19

By:


JOSEPH LEVENTAN- Pro-Se
11017 Rennard Street
Philadelphia, PA 19116
215-519-5364

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

PAYMENT BY ACCOUNT (if applicable)

USPS® Corporate Acct. No. Federal Agency Acct. No. or Postal Service™ Acct. No.

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Date Accepted (MM/DD/YY) <i>6/28/19</i>	Scheduled Delivery Time <input type="checkbox"/> 10:30 AM <input type="checkbox"/> 3:00 PM <input checked="" type="checkbox"/> 12 NOON	Insurance Fee \$
Time Accepted <i>12:13 PM</i>	10:30 AM Delivery Fee \$	Return Receipt Fee \$
Special Handling/Fragile \$	Sunday/Holiday Premium Fee \$	Total Postage & Fees <i>25.50</i>
Weight <i>3</i> lbs. <i>oz.</i>	Acceptance Employee Initials <i>gmy</i>	

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