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July 22, 2019

VIA ELECTRONIC FILING

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

**RE: Talmudic Yeshiva of Philadelphia v. Sprague Operating Resources, LLC**  
**Docket No. C-2019-3010157**

Dear Secretary Chiavetta:

Enclosed for filing please find a Motion for Continuance in the above-captioned matter. A copy has been served in accordance with the enclosed Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Respectfully submitted,

STEVENS & LEE



Michael A. Gruin

Enclosure

cc: Administrative Law Judge Joseph Brady (via Email and First Class U.S. Mail)  
Certificate of Service

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Philadelphia • Princeton • Reading • Rochester • Scranton • Valley Forge • Wilkes-Barre • Wilmington  
A PROFESSIONAL CORPORATION

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

TALMUDIC YESHIVA OF  
PHILADELPHIA  
Complainant

v.

SPRAGUE OPERATING RESOURCES,  
LLC

Docket No. C-2019-3010157

**NOTICE TO PLEAD**

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**To: *Talmudic Yeshiva of Philadelphia***

You are hereby notified to file a written response to the attached Motion within twenty (20) days from the date of service of this notice. If you do not file a written response to the enclosed Motion within twenty (20) days of service, the facts set forth by Sprague Operating Resources, LLC may be deemed to be true, thereby requiring no other proof, and the relief sought by the Motion may be granted. All pleadings, such as Answers to Motions, must be filed with the Secretary of the Pennsylvania Public Utility Commission:

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

You must also serve a copy of your response on the undersigned counsel for Sprague Operating Resources, LLC.

STEVENS & LEE



Michael A. Gruin, (I.D. No. 78625)  
17 N. 2<sup>nd</sup> St., 16<sup>th</sup> Fl  
Harrisburg, PA 17101  
Tel. (717) 255-7365  
Fax (610) 988-0852  
COUNSEL FOR SPRAGUE  
OPERATING RESOURCES, LLC

Date: July 22, 2019

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

TALMUDIC YESHIVA OF	:	
PHILADELPHIA	:	
Complainant	:	
	:	
v.	:	Docket No. C-2019-3010157
	:	
SPRAGUE OPERATING RESOURCES,	:	
LLC	:	

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**MOTION FOR CONTINUANCE OF  
SPRAGUE OPERATING RESOURCES, LLC**

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AND NOW, Sprague Operating Resources, LLC (“Sprague” or “Company”), by and through its attorneys Stevens & Lee, P.C., hereby files this Motion pursuant to 52 Pa Code § 1.15 to request a continuance of the hearing scheduled for July 25, 2019 in this matter, for the reasons set forth below:

1. On May 29, 2019, Sprague was served with a Formal Complaint (“Complaint”) filed by Talmudic Yeshiva of Philadelphia (Complainant) against the Sprague.
2. Sprague filed its Answer to the Complaint on June 13, 2019.
3. By Hearing Notice issued on June 18, 2019, a hearing in this matter was scheduled for July 25, 2019 before Administrative Law Judge F. Joseph Brady.
4. On July 3, 2019, counsel Michael Gruin entered his appearance for Sprague.
5. On July 9, 2019, counsel for Sprague contacted Judge Brady via electronic mail to request a continuance of the hearing due to the fact that he is scheduled to appear at another hearing on July 25, 2019, and to allow additional time for discussions towards

a resolution of this matter. At that time, Complainant had not yet had an attorney enter an appearance in this matter.

6. On July 19, 2019, attorney Roseann Brenner entered her appearance for the Complainant in this matter.

7. With this Motion, Sprague respectfully requests a 60- day continuance of the hearing in this matter, due to its counsel's scheduling conflict, and to allow the parties additional time to discuss a potential resolution of this matter.

8. Counsel for the Complainant has indicated that she does not object to a continuance.

**REQUEST FOR RELIEF**

WHEREFORE, for all of the reasons stated herein, Sprague Operating Resources, LLC respectfully requests that the hearing in this matter be continued for approximately sixty (60) days.

STEVENS & LEE



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Michael A. Gruin, (I.D. No. 78625)  
17 N. 2<sup>nd</sup> St., 16<sup>th</sup> Fl  
Harrisburg, PA 17101  
Tel. (717) 255-7365  
Fax (610) 988-0852  
COUNSEL FOR SPRAGUE  
OPERATING RESOURCES, LLC

DATE: July 22, 2019

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

TALMUDIC YESHIVA OF	:	
PHILADELPHIA	:	
Complainant	:	
	:	
v.	:	Docket No. C-2019-3010157
	:	
SPRAGUE OPERATING RESOURCES,	:	
LLC	:	

**CERTIFICATE OF SERVICE**

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

VIA Electronic Mail and First Class U.S. Mail

Roseann Lynn Brenner  
Goldfein & Joseph, P.C.  
1880 JFK Boulevard, 20<sup>th</sup> Floor,  
Philadelphia, PA 19103



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Michael A. Gruin

DATED: July 22, 2019