

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

E. S. Management

Docket No. C-2019-3012073 (water)

Complainant,

vs.

Pittsburgh Water and Sewer Authority,

**REPLY TO NEW MATTER**

Respondent.

Filed on Behalf of Complainant,

E. S. Management

Counsel of Record:

Bradley S. Dornish, Esquire  
PA ID #: 40990

Mary Elizabeth Fischman, Esquire  
PA ID #: 200390

DORNISH LAW OFFICES, P.C.  
2500 Brooktree Road, Suite 301  
Wexford, PA 15090  
(412) 765-2726

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PENNSYLVANIA PUBLIC UTILITY COMMISSION**

E. S. Management	:	Docket No. C-2019-3012073 (water)
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Complainant	:	
	:	
vs.	:	
	:	
Pittsburgh Water and Sewer Authority,	:	
	:	
Respondent.	:	

**REPLY TO NEW MATTER**

AND NOW comes Complainant E. S. Management, by and through its attorneys, Bradley S. Dornish, Mary Elizabeth Fischman and the Dornish Law Offices, P.C. pursuant to 52 Pa. Code §5.63 files this Reply to New Matter of Pittsburgh Water and Sewer Authority (“PWSA”) and avers as follows:

11. Since the filing of the formal Complaint in this matter, E. S. Management has retained the services of Bradley S. Dornish, Mary Elizabeth Fischman and Dornish Law Offices, P.C. and therefore is now in compliance with 52 Pa. Code §§ 1.21-1.23.

12. Denied. E. S. Management is a fictitious name for Kerpec Corporation as listed with the Pennsylvania Corporation Bureau.

13. Paragraph 13 is a conclusion of law to which no response is required. To the extent an answer is required, since the filing of the formal complaint, E. S. Management has retained the services of Bradley S. Dornish, Mary Elizabeth Fischman and Dornish Law Offices, P.C. and therefore is now in compliance with 52 Pa. Code §§ 1.21-1.23.

14. Admitted.

WHEREFORE, E. S. Management respectfully requests that the Commission enter judgment in its favor on the Formal Complaint.


Respectfully submitted,

By: Mary Elizabeth Fischman  
Mary Elizabeth Fischman, Esquire  
Attorney for Complainant  
2500 Brooktree Road, Suite 301  
Wexford, PA 15090  
(412) 765-2726

**VERIFICATION**

I, Robert Cohen, Manager of E. S. Management, verify that the facts set forth in the Reply to New Matter of the Pittsburgh Water and Sewer Authority are true and correct to the best of my knowledge, information, and belief. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. 4904, relating to unsworn falsification to authorities.

10/9/19  
Date

  
\_\_\_\_\_  
Robert Cohen  
E.S. Management

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing Reply to New Matter has been forwarded to the following by First Class U. S. Mail, postage pre-paid and by electronic mail on the 9<sup>th</sup> day of October 2019, as follows:

Karen O. Moury, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101  
kmoury@eckertseamans.com

Dated: October 9, 2019

Mary Elizabeth Fischman  
Mary Elizabeth Fischman, Esquire