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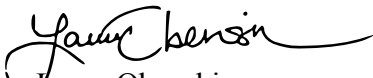
October 17, 2019

Re: Laura Obenski v. Sunoco Pipeline L.P., #C-2019-3006905
Flynn et al. v. Sunoco Pipeline L.P., #C-2018-3006116
RESPONSE TO SUNOCO'S MOTION IN LIMINE

Dear Secretary Chiavetta,

Enclosed for filing with the Pennsylvania Public Utility Commission, please find my response to Sunoco's Motion in Limine. Please feel free to contact me directly with any questions.

Regards,


Laura Obenski, *pro se*

Attachment
cc: Certificate of Service

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

LAURA OBENSKI
Complainant

v.

SUNOCO PIPELINE L.P.
Respondent

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DOCKET #C-2019-3006905

MEGHAN FLYNN ET AL.
Complainants

v.

SUNOCO PIPELINE L.P.
Respondent

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DOCKET #C-2018-3006116

OBENSKI RESPONSE TO SUNOCO’S MOTION IN LIMINE

On October 9, 2019, Sunoco filed a motion in limine to ask the Honorable Judge Barnes to preclude evidence and witnesses that may be presented at the upcoming October 23-24 hearing. Additionally, concerns were brought forth that testimony *may* be redundant, irrelevant, and improperly contain opinions by individuals that Sunoco feels should not be entitled to opinions. It also *may* not.

Respectfully, I ask for each of these motions to be denied in their entirety.


Multiple pre-conference hearings have occurred, which Sunoco was party to, all of which included instructions from Judge Barnes to take reasonable efforts to reduce redundant testimony. This was discussed and agreed to by all parties. Additionally, as a pro se complainant, I can assure you this request has been taken very seriously and much work has gone into planning testimony in an attempt to minimize the length and disruption this hearing will cause to my family’s life. There is no way to pre-emptively preclude witnesses or exhibits without disrespecting the due process each party in this case is privy to.

Additionally, I have confidence that ALJ Barnes is fully capable of taking any objections that should arise during the hearing and making a competent determination of their relevance to this case, as is standard for any court proceeding of this nature.

Sunoco’s concern that testimony may “confuse and alarm the public” is well placed- but only in the context that ‘the public’ refers to the confused and alarmed complainants that have been put at risk by the Mariner East project and are entitled to have their very real concerns regarding the safety of their families in their homes and communities heard before the PUC.

I pray the Honorable Judge Barnes denies each of these motions in their entirety and I look forward to the opportunity to hear the facts and opinions of those affected during next week’s hearing.

Respectfully,


Laura Obenski, pro se
October 17, 2019

CERTIFICATE OF SERVICE

I hereby certify that on this day, October 17, 2019 I have served a true copy via electronic mail of the forgoing document upon the parties, listed below, in accordance with the requirements of 52 PA Code § 1.54 (relating to service by a party).

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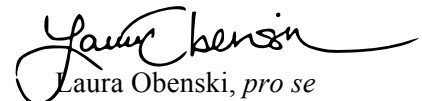
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Laura Obenski, *pro se*
October 17, 2019

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