

November 8, 2019

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

RE: Christ Temple Church of Pittsburgh v. Pittsburgh Water & Sewer Authority
PUC Docket No: C-2019-3008013

Dear Secretary Chiavetta:

Enclosed please find Christ Temple Church of Pittsburgh's Joint Motion For Continuance for filing. A copy of this document has been served upon Respondent's counsel in accordance with Commission regulations.

Sincerely,



Jeremy V. Farrell
Attorneys for Christ Temple Church of Pittsburgh

Enclosure

c: Carl R. Shultz, Esquire (w/enc.) (via email)
The Honorable Katrina Dunderdale (w/enc.) (via fax)

TADMS:5224862-1 014657-158498

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

CHRIST TEMPLE CHURCH OF PITTSBURGH,)	
)	
Complainant,)	
vs.)	Docket No. C-2019-3008013
)	
PITTSBURGH WATER & SEWER AUTHORITY,)	
)	
Respondent.)	

JOINT MOTION FOR CONTINUANCE

TO THE HONORABLE COMMISSION:

Complainant Christ Temple Church of Pittsburgh PA and Respondent Pittsburgh Water and Sewer Authority, by and through their respective attorneys, file this Joint Motion for Continuance of Hearing in accordance with 52 Pa. Code § 1.15(a)(1).

1. An initial telephonic hearing is currently scheduled to take place on Tuesday, November 19, 2019, at 10:00 a.m.
2. Complainant's counsel was retained on the afternoon of November 7, 2019, has not yet even received a copy of the pleadings, and does not have sufficient time to prepare for the currently-scheduled hearing date.
3. Complainant's counsel contacted Respondent's counsel on the evening of November 7, 2019. After a productive discussion, Respondent consented to Complainant's request for a continuance.
4. Counsel for the Parties believe that a continuance of 60-90 days is appropriate in this case for two reasons. One, the Parties intend to seriously explore settlement as to some or all of the outstanding issues, which could either limit the issues that need to be addressed at the hearing or obviate the need for a hearing altogether. And, two, to allow counsel for Complainant adequate time to get up to speed on the case.


5. Therefore, the Parties respectfully request that the hearing be continued for an additional 60 to 90 days to allow the Parties to continue their discussions and attempt to settle the case. If the parties are able to resolve the case, an appropriate Certificate of Satisfaction will be filed.

WHEREFORE, Complainant and Respondent respectfully requests a 60 to 90 day continuance of the currently scheduled hearing date.

ECKERT SEAMANS CHERIN & MELLOTT


TUCKER ARENSBERG, P.C.

By:



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By:



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Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

CHRIST TEMPLE CHURCH OF PITTSBURGH,)
)
 Complainant,)
 vs.) Docket No. C-2019-3008013
)
 PITTSBURGH WATER & SEWER AUTHORITY,)
)
 Respondent.)

CERTIFICATE OF SERVICE

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

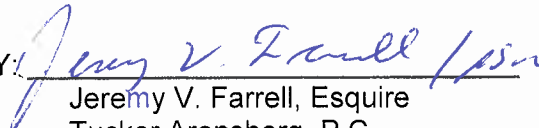
Carl R. Shultz, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street - 8th Floor
Harrisburg, PA 17101

(via email: cshultz@eckertseamans.com)

The Honorable Katrina Dunderdale
Office of Administrative Law Judge
Pennsylvania Public Utility Commission
Piatt Place - Suite 220
301 Fifth Avenue
Pittsburgh, PA 15222

(via fax: 412-565-5692)

Dated: November 8, 2019

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