

331 Shady Ridge Drive
Monroeville, Pennsylvania

November 12, 2019

RECEIVED

NOV 12 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Via Paper Filing

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

RE: **Michele Hriadil and Francis Hriadil v. Duquesne Light Company**
Docket No. C-2016-2571726

Dear Secretary Chiavetta:

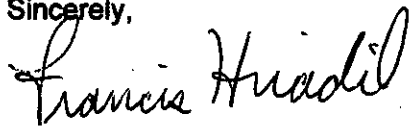
Enclosed please find copies of the Complainants' three (3) motions filed to ALJ Watson, associated with our November 8, 2019 Request Concerning Respondent's Filing of Multiple Motions in Limine at This Time:

- November 12, 2019 Motion for Summary Judgment.
- November 12, 2019 Motion to Quash the Respondent's Untimely, Concurrent Motions in Limine and Restore Lost Final Hearing Preparation Time to the Complainants.
- November 12, 2019 Motion for a Continuance to Provide the Complainants with Sufficient Time to Both Properly Review and Address the Respondent's Detailed, Concurrent Motions in Limine and Complete Our Final Hearing Preparations

Copies of these documents have been served upon ALJ Jeffrey Watson, Presiding PA PUC Pittsburgh Administrative Law Judge, and the Respondent's Counsel, Jeremy V Farrell, Esquire, along with their respective Certificates of Service, in accordance with Commission regulations.

Please feel free to contact me if you have any questions.

Sincerely,



Francis Hriadil
Complainant
(412) 779-3314
hriadil@attglobal.net

Enclosures

Cc: Judge Jeffrey Watson, Presiding PA PUC Pittsburgh Administrative Law Judge

Cc: Jeremy V Farrell, Esquire, Counsel for Duquesne Light Company

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Michele Hriadil and
Francis Hriadil,

Complainant,

vs.

DUQUESNE LIGHT COMPANY,

Respondent.

RECEIVED

NOV 12 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

No: C-2016-2571726

**MOTION FOR A CONTINUANCE
TO PROVIDE THE COMPLAINANTS WITH
SUFFICIENT TIME TO BOTH PROPERLY
REVIEW AND ADDRESS THE RESPONDENT'S
DETAILED, CONCURRENT MOTIONS IN LIMINE
AND COMPLETE
OUR FINAL HEARING PREPARATIONS**

Filed by Michele and Francis Hriadil

hriadil@attglobal.net
(412) 779-3314
331 Shady Ridge Drive
Monroeville, Pennsylvania

**MOTION FOR A CONTINUANCE
TO PROVIDE THE COMPLAINANTS WITH SUFFICIENT TIME TO BOTH PROPERLY
REVIEW AND ADDRESS THE RESPONDENT'S DETAILED, CONCURRENT MOTIONS IN LIMINE
AND COMPLETE OUR FINAL HEARING PREPARATIONS**

TO: THE HONORABLE ALJ JEFFREY WATSON.

**REGARDING COMPLAINANTS' NOVEMBER 8, 2019 REQUEST CONCERNING
RESPONDENT'S FILING OF MULTIPLE MOTIONS IN LIMINE AT THIS TIME,
ENCLOSED IS COMPLAINANTS' MOTION FOR A CONTINUANCE TO PROVIDE
THE COMPLAINANTS WITH SUFFICIENT TIME TO BOTH PROPERLY REVIEW
AND ADDRESS THE RESPONDENT'S DETAILED, CONCURRENT MOTIONS IN
LIMINE AND COMPLETE OUR FINAL HEARING PREPARATIONS.**



Francis Hriadil
November 12, 2019

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Michele Hriadil and
Francis Hriadil,

Complainant,

vs.

DUQUESNE LIGHT COMPANY,

Respondent.

No: C-2016-2571726

**MOTION FOR A CONTINUANCE
TO PROVIDE THE COMPLAINANTS WITH SUFFICIENT TIME TO BOTH PROPERLY
REVIEW AND ADDRESS THE RESPONDENT'S DETAILED, CONCURRENT MOTIONS IN LIMINE
AND COMPLETE OUR FINAL HEARING PREPARATIONS**

TO THE HONORABLE ALJ JEFFREY WATSON:

1. On November 8, 2019, the Complainants' filed our Request Concerning Respondent's Filing of Multiple Motions in Limine at This Time.

2. This is the third Motion that the Complainants are filing to seek a fair remedy of circumstances created by the Respondent's filing of multiple Motions in Limine, in the manner that it has at this time.

3. The Complainants first motion and our preferred remedy - Motion for Summary Judgment.

This motion has been filed because of the Respondent's behavior which disrespects the Complainants and dishonors this Court; because of the Respondent's blatant attempt to harass an elderly, disabled Complainant; because of the untimeliness and concurrence of the Respondent's filings at this time, and because of the other reasons already stated in our previous writings.
The most appropriate remedy is to grant our summary judgment motion, and our legitimate request for relief.

4. The Complainants second motion - Motion to Quash the Respondent's Untimely, Concurrent Motions in Limine and Restore Lost Final Hearing Preparation Time to the Complainants

If this Court is indisposed to grant the Complainants' Motion for Summary Judgment at this time, a second remedy would be to quash both of Respondent's Motions in Limine, and restore the time that has been lost to the Complainants in completing our final Hearing preparations.

5. The Complainants third motion, our motion herein, is for a Continuance to properly review and address the Respondent's detailed Motions in Limine. If this Court is indisposed to grant either of the Complainants' other two (2) motions, this third motion affords the Court a remedy providing the bare minimum necessary to maintain the appearance of fair treatment of the Complainants.

6. In association with our November 8, 2019, Request Concerning Respondent's Filing of Multiple Motions in Limine at This Time, the Complainants herein file this Motion for a Continuance to provide the complainants with sufficient time to both properly review and address the Respondent's detailed, concurrent Motions in Limine and also complete our final Hearing preparations.

7. In addition, the Court is reminded that Complainant Francis Hriadil has a lawful disability, and the severe winter months have had a detrimental effect on my condition and symptoms, which can impair my ability to fully participate in and physically appear at a Hearing,

WHEREFORE, in light of these circumstances, Complainants Michele Hriadil and Francis Hriadil wish and respectfully request that Your Honor immediately grant a continuance of at least 90 days for our Evidentiary Hearing, whose date should be determined, as in the past, by the availability of the court and everyone's witnesses. A time frame of April 2020 is suggested to reasonably accommodate Francis Hriadil's disability and clinical conditions.

Respectfully yours,


Francis Hriadil
(412) 779-3314
331 Shady Ridge Drive
Monroeville, Pennsylvania

RECEIVED

NOV 12 2019

THEREFORE,

IT IS ORDERED:

1. That the Complainants' request for a continuance to allow them sufficient time to properly review and address the Respondent's two motions in limine and complete their final hearing preparations, is granted; and
2. That the evidentiary hearing scheduled for November 20-21, 2019 is hereby continued until _____, 2020; and
3. That the parties are hereby directed to contact their respective proposed fact and expert witnesses and identify their availability to present testimony at the hearing in this case in compliance with item 3 above.

Date: _____

Jeffrey A. Watson
Administrative Law Judge

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED

NOV 12 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Michele Hriadil and
Francis Hriadil,

Complainant,

vs.

No: C-2016-2571726

DUQUESNE LIGHT COMPANY,

Respondent.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of Complainants' **Motion for a Continuance to Provide the Complainants with Sufficient Time to Both Properly Review and Address the Respondent's Detailed, Concurrent Motions in Limine and Complete Our Final Hearing Preparations**, upon the participants listed below in accordance with the requirements of 52 PA. Code § 1.54 (relating to service by a participant):

Via Paper Filing

Judge Jeffrey Watson
PA PUC Pittsburgh Administrative Law Judge Office
301 Fifth Ave, Suite 220
Piatt Place
Pittsburgh, PA 15222

Via Paper Filing

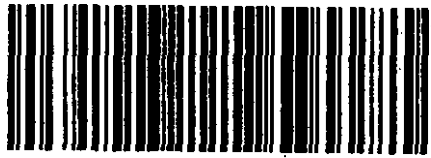
Jeremy V Farrell, Esquire
Paul S Miller, Esquire
One PPG Place - 1500
Pittsburgh, PA 15222
(412) 594-5619 (Fax)

Counsel for Respondent, Duquesne Light Company

Dated this 12th day of November, 2019



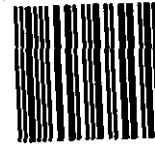
Michele and Francis Hriadil
331 Shady Ridge Drive
Monroeville, Pennsylvania
(412) 779-3314
hriadil@attglobal.net



7015 1660 0000 4893 9755



1000



17120

U.S. POSTAGE PAID
FCM LG ENV
TURTLE CREEK, PA
15146
NOV 12, 19
AMOUNT

\$4.95

R2305M148208-13

F. Hriadil
331 Shady Ridge Drive
Monroeville, PA 15146

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