

BRUCE E. DICE & ASSOCIATES, PC.

ATTORNEYS AT LAW

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December 17, 2019

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

RE: Municipality of Penn Hi9lls c/o Scott Andrejchak v. Union Railroad Company,
et. al. Docket No. C-2019-3013809

Dear Secretary Chiavetta:

Enclosed for filing please find the Complainant's Prehearing Conference Memorandum in the above-captioned matter. The Memorandum was originally filed yesterday but was rejected as it was inadvertently not sent to you. I apologize for any inconvenience.

I hereby certify that a copy has been sent to all parties of record as indicated by the Certificate of Service.

Very truly yours,
BRUCE E. DICE & ASSOCIATES, P.C.



Craig H. Alexander, Esquire

CHA/alo

Cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MUNICIPALITY OF PENN HILLS C/O)	
SCOTT ADREJCHAK)	No. C-2019-3013809
)	
Complainant)	Electronically filed
)	
v.)	
)	
UNION RAILROAD COMPANY, CITY OF)	
PITTSBURGH, BOROUGH OF VERONA,)	
COUNTY OF ALLEGHENY, PENNDOT)	
)	
Respondent)	

**PREHEARING CONFERENCE MEMORANDUM
OF THE MUNICIPALITY OF PENN HILLS**

And now comes the Municipality of Penn Hills, by and through its Solicitor, Craig H. Alexander and Bruce E. Dice & Associates and, in accordance with the November 25, 2019 Prehearing Conference Order issued by Administrative Law Judge Katrina L. Dunderdale, in the above referenced matter, the Municipality of Penn Hills hereby submits as follows:

1. Service:

The Municipality requests that service of all pleadings, documents and communications be sent to the Municipal Solcitor addressed as follows:

Craig H. Alexander, Esquire
Bruce E. Dice & Associates, P.C.
787 Pine Valley Drive, Suite E
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(724) 733-3080
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2. Statement regarding settlement:

The Municipality is eager to discuss a mutual settlement once the parties and issues are properly identified.

3. Discovery and Litigation Schedule:

The Municipality proposes that a discovery and litigation schedule by issued that is mutually agreeable to all parties.

4. Witnesses, Issues & Evidence to be presented:

At this time, the Municipality is still investigating this claim and does not presently have a list of witnesses. The issues are as identified in the initiating complaint and evidence at this point is still being collected. However, the seminal issue to the Municipality is the Union Railroad's responsibility as identified in the complaint.

Respectfully submitted,



Craig H. Alexander, Esquire
Attorney for Plaintiff

Bruce E. Dice & Associates, P.C.
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Tel. No. (724) 733-3080

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PITTSBURGH, BOROUGH OF VERONA,)	
COUNTY OF ALLEGHENY, PENNDOT)	
)	
Respondent)	

CERTIFICATE OF SERVICE

I, Craig H. Alexander, Esquire, do hereby certify that, a true and correct copy of the foregoing DEFENDANT’S, ANSWER AND NEW MATTER were sent via email to the below named individual:

Hon. Katrina L. Dunderdale Administrative Law Judge
Pennsylvania Public Utility Commission Piatt Building, Suite 220
301 Fifth Avenue
Pittsburgh, PA 15222
kdunderdal@pa.gov

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Borough of Verona Bruce Dice, Solicitor
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