

Roy Cumming C-2019-3007989  
and

RECEIVED

2020 JAN -3 AM 9:50

Liza Mousios C-2019-3007995

PA PUC  
SECRETARY'S BUREAU

Met Ed

Motion to Stay the Hearing given  
the ensuing facts for the orderly  
proceedings of justice.

1) On December 19, 2019 Mr. Cumming and Ms. Mousios received the response and objection from First Energy and the grammatically challenged Tori Giesler. On December 21, 2019 Complainants Cumming and Mousios received Judge Neep's Denial of Complainants Motion to continue the hearing pending the outcome of her (10) appeals in Commonwealth Court against the forced installation of smart meters. Judge Neep DENIED Complainants' Motion WITHOUT ALLOWING CUMMING and MOUSIOS TO RESPOND TO MBT ED/ FIRST ENERGY

Commins + Mousios v. Met Ed

objections. THIS IS UNILATERAL  
CORRUPTION. Though not expressly ex  
parte communication, this one-sided  
ruling without allowing time for Complainant  
to respond - with a denial arriving two  
(2) days after Met Ed's objections,  
is tantamount to ex parte communication.  
THIS IS BEING SENT TO THE  
P.A. JUDICIAL BOARD AGAINST  
JUDGE NEEP WITH COMPLAINTS  
AS TO NRP SCURRILOUS ETHICS.

2) Tori Giesler vituperatively and  
viciously excoriates Ms. Mousios' state  
mandated homelessness from the heat  
and comfort of her home/office.  
Attempting to decipher Giesler's  
punctuation and syntax errors, one

Commings and Mousios v. Met Pd

can deduce that the <sup>state</sup> forcibly homeless  
 Ms. Mousios would want to see her  
 case move through litigation so that  
 she can see resolution of her concern.  
 Commonwealth forced homelessness is  
 agony, not a "concern". Furthermore,  
 Grester knows there is NO resolution  
 of an ethical <sup>or objective</sup> nature - Complainants  
 with three doctors and incontrovertible  
 evidence STILL LOSE IN SHAM  
 COURT, PUC'S evil feigns it knows  
 more than complainants' own doctors.

3) In William and Jean Haas v.  
 Pennsylvania Public Utilities Commission  
 Petitioners eloquently articulate that  
 Pennsylvanians MUST AGREE (my emphasis)

to accept exposure to radio frequency toxicity.

Mr. Cumming and Ms. Mousios move to STAY their hearing until the outcome of William and Jean Haas v. PUC.

4) In requesting an in-person hearing Ms. Mousios exhorted that in order for her to appear, all wireless and smart meters would have to be removed for the hearing. Judge Neep venally and spuriously ignores this accommodation under the Americans with Disabilities Act per Ms. Mousios' request.

THIS IS GOING TO THE JUDICIAL BOARD. It would be acceptable to have the hearing at Ms. Mousios' tent, DRESS WARM after the STAY is honored and outcomes completed if disabled

Cummings  
Mousios  
Met Ed

5

5) During the pre-hearing conference, Ms. Mousios was able to thread a very long telephone wire through the window for the telephone conference <sup>to be outside</sup>. It is too cold for that now. Ms. Mousios cannot use a cell phone, which emits RF's. The landlines of friends all have smart meters, or else there is WIRE which Ms. Mousios cannot tolerate.

6) In November 2019, Mr. Bill Bathgate, Complainant's expert witness had planned to come to Mr. Cummings's home / Ms. Mousios' former home for an expert evaluation. However, Mr. Bathgate's circumstances changed and he was unable

(6)

b) to come to. Complainers' home and displaced home respectively in November, Mr. Bathgate informed Complainers that since the weather is very inclement in Michigan, it is too dangerous for him to travel for the evaluation.

Mr. Bathgate is willing to do a thorough evaluation of the toxicity emanating from Complainers' neighbors smart meter at the end of March, when road conditions are safer.

Mr. Bathgate is a highly specialized expert and perhaps the only expert on the secondary antenna effect from smart meters. He is supremely erudite about not only radio frequency emanations from smart meters, but also illegal amounts of conducted emissions.

Cummins  
v.  
Mousios

v.  
~~MET~~ FD

6) continued

For Judge Neep to rule that Cummins and Mousios be denied their extremely specialized expert witness,

in favor of someone less perspicitou than Mr. Bathgate, would be tantamount to prohibiting illegally, Complainants' ability to preserve their issues on appeal. Any such ruling that Complainants cannot be granted a stay given all the aforementioned and most notably, Complainants' inability to retain Mr. Bathgates until late March, WILL RESULT IN IMMEDIATE

# NOTIFICATION TO THE JUDICIAL BOARD OF JUDGE NEEP'S ANTICIPATORY UNETHICAL ACTION OF DENYING DUE PROCESS AS AN ERROR OF LAW ON APPEAL.

7) A landline is not an accoutrement of Ms. Mousios' state forced homelessness and complainants move to stay the January 7, 2020 conference, as well as the only solution is not to bombard us with more radiation and illegal level conducted emissions.

8) Judge Neep's pontification that, "[t]he law can only be applied as it exists is amoral and venal at best the Fugitive Slave Act of 1850 was applied as it existed,

Laws prohibiting women from being judges and lawyers were applied as they existed.

(9)

And Act 129 is being bastardized from its original intent as an opt-in measure.

The Energy Policy Act of 2005 §12 and PA Title 66/1501 which would protect us from this execrable evil are not viewed with such sacrosanct reverence as the solipsistic greed of misapplying Act 129.

PA Title 66/1501 decrees that the energy must be both safe and reasonable. Destroying our health and making Ms. Mausios homeless is neither safe nor reasonable, merely amoral in the reciprocal evil between the PUC and Met Ed et al.

To paraphrase Judge Neep, PA Title 66/1501 must be applied

as it exists. Therefore, we move  
to stay the hearing subject to  
the outcome of Haas v. PUC, the 10  
(ten) pending appeals and the  
lack of Complainant's expert witness  
Mr. Bill Bathgate's availability until  
late March 2020.

a) Fortunately, a major magazine with  
the media has recently taken keen  
interest in Ms. Mousios' plight: her  
forced homelessness concomitant with  
health problems she never before  
experienced, the death and sicknesses  
of her dogs - all of the above with  
strong and incontrovertible temporal  
association when away from the smart  
meter next door.

Ms. Mousios will apprise the TV  
magazine of the ruling by Judge Neep

and resulting actions which transpire.  
Ms. Mousros' ~~ORIGINAL~~ letters from her physician  
have already been sent to the PUC  
by her Congresswoman Wendy Ullman.

10) It should be duly noted that  
packages from respondents that are  
left at neighbor's residence or tossed  
in ~~overgrown~~ brush by UPS, without  
signature outside an obviously overgrown  
unused porch, do not constitute proper  
service. In one such mail graveyard  
was a package from September 2019,

Roy Cummins  
12/18/19

Nonetheless submitted!  
Eli Mousros  
December 2019

# FINAL WITNESS LIST

- 1) Dr. William Kracht by affidavit.
- 2) Mr. Bill Bathcote by affidavit -  
unavailable until <sup>late</sup> March 2020.
- 3) Roy Cummins
- 4) Liza Mousios



04/09/2019

Liza Mousios  
P.O. Box 116  
Revere, PA 18953-

Dear To Whom It May Concern,

My patient Liza Mousios, (DOB 01/04/1953), has been unable to live in her home due to electromagnetic hypersensitivity since the installment of the smart meters. Which has caused her to experience a multitude of symptoms including; vomiting blood, shortness of breath and chest discomfort. Which are currently detrimental to her health and well being. The smart meter is hindering with daily activities in her home and for that reason must reside in her vehicle. For these medical reasons I request the smart meter should be removed.

Should you need further information, please feel free to contact our office at 215.536.1890. I appreciate your prompt attention to this matter.

Sincerely,

*Provider:*

Kracht DO, William 04/09/2019 1:07 PM

Document generated by: Nora Ortiz 04/09/2019

Woodlands Healing Research Center  
Integrative Family Medicine  
5724 Clymer Rd., Quakertown, PA 18951  
www.woodmed.com / foffice@woodmed.com  
Phone: 215-536-1890 / Fax: 215-529-9034



02/23/2019

Liza Mousios  
P.O. Box 116  
Revere, PA 18953-

To: Whom it may concern,

My patient Liza Mousios, (DOB 01/04/1953), suffers from electromagnetic hypersensitivity. The smart meter emits RF radiation which will aggravate my patients existing medical condition. Because of my patients electromagnetic hypersensitivity, I request the smart meter not be installed, allowing my patient to live in and enjoy her residence without the RF radiation exposure.

Should you need further information, please feel free to contact our office at 215.536.1890. I appreciate your prompt attention to this matter.

Sincerely,



Provider:

Kracht DO, William 02/23/2019 2:53 PM

Document generated by: Nora Ortiz 02/23/2019

Woodlands Healing Research Center  
Integrative Family Medicine  
5724 Clymer Rd., Quakertown, PA 18951  
[www.woodmed.com](http://www.woodmed.com) / [foffice@woodmed.com](mailto:foffice@woodmed.com)  
Phone: 215-536-1890 / Fax: 215-529-9034

~~Subject: Liza Photos~~  
~~To: cumming@epix.net~~

Exhibit C

AA

State Forced Homelessness

Hi Liza,

Here are the pictures you asked me to send.



RE

SMART METER PLC + METERED FORCED HOMELESS

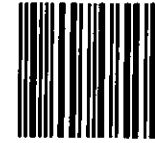
**FROM:**



Cumming  
PO Box 396  
Revere, PA 18953



1000



17120

U.S. POSTAGE PAID  
FCM LG ENV  
REVERE, PA  
18953  
DEC 31, 19  
AMOUNT

**\$2.20**

R2304M110882-18

**TO:**

ROSEMARY CHIAVETTA, SEC.  
PENN PUBLIC UTILITY COMM.  
COMMONWEALTH KEYSTONE BUILDING  
400 NORTH ST, 2<sup>ND</sup> FLOOR  
HARRISBURG, PA, 17120