

Liza Mousios
and

~~C-2019-3007989~~
C-2019-3007989

Roy Cummins

C-2019-3007995

Further Amended Motion to Quash
Respondent's Motion to Compel, Including
but Not Limited to the fact that
Respondents have Given Incomplete
Answers and Excessive Objections
and Their Motion is Plainly Hypocritical

- 1) Respondents are hypocritically demanding responses which Complainants have supplied (including expert witness documents) while propounding eleven objections and mendacious answers and incomplete answers.
- 2) Respondents objected to no fewer than ELEVEN of Complainants

Interrogatories: 1, 3, 6, 7, 10, 11, 13, 14
26, 30 and 36!!

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3) Furthermore, when Respondents feigned answering Complainants' interrogatories, the answers were incomplete and mendacious lies. For example, in their hearkly unintelligible and syntax challenged,

iteration of Ms. Mousios' interrogatory "How much has [Dr.] Israel been paid to date?" Met Ed prevaricate and promulgate this outright lie which is not credible: "Dr. Israel has not been paid for work in this matter to date," this is unctuous, and deceptive because it speaks to not being paid for Mousios' and Cummins' "this matter" when that was not the question. Of course he has not been paid on Cummins and Mousios case = the question was "How much has Israel been paid TO DATE."

In interrogatory a the question is "How much is profligate Dr. Israel

paid PER CASE AS AN UNETHICAL
"expert witness?"

Respondents' NON-ANSWER
ANSWER is "compensation for an
expert witness varies greatly from one case
to the next and is not on a per-case
basis"

(A) This is a dissembling, venal
NON-ANSWER with NO FINANCIAL
NUMERICAL FIGURE IN THE ANSWER.

(B) If "compensation for an expert
witness varies greatly from one case to
the next..." then contrary to
Lepkoski's unintelligible "reasoning",
payment of the expert witness IS ON
A PER CASE BASIS and at
least Lepkoski should have given a
RANGE OF PAYMENT FOR
CASES, this is a dissembling and
INCOMPLETE ANSWER.

Mousios v. Cunningham 4
M.A. Ed

Judge Weep is in violation of
~~PA 52 Code 5.349~~ in deeming the
answers are due in 5 days, as the
PA 52 Code 5.349 allows 20 days
for complainants to respond.

Furthermore, Judge Weep is in violation
of the Rule of Law ~~BECAUSE DISCOVERY~~
~~PROVIDED ON or around September 30, 2019~~
and she is unilaterally denying and
ignoring said fact of DISCOVERY.

Respondents had ample time to
complete discovery before this date.
JUDGE WEEP SHOULD NOT BE
UNSCRUPULOUSLY AND INCRUSTOUSLY
IN BRD WITH RESPONDENTS THAT
SHE UNILATERALLY AND CAPRICIOUSLY
VIOLATES THE RULE OF LAW AND
MOURS DISCOVERY UNILATERALLY TO THE
ELEVENTH HOUR.

(5) A

to Mousious [sic] / Cummins
Interrogatory Set 1, No. 18.
This blanket non-answer
does not cover all these
diverse interrogatories #20, #21, #22
and #23.

In Interrogatory No. 25 Respondent
bastardize the question and fail
to respond at all.

Met Ed's response to Interrogatory #
is that, "Metropolitan Edison Company's
position is that the law makes it clear
that there are no exceptions to the
installation of a smart meter, notwith-
any other argument that a party may
make".

Then Lepkoski's response to Interroga-
No. 37:

(5) B

④) The answer that the total transmissions add up to, on average, about three minutes of total time per meter, per day, "..." is an abject fallacious lie and disproven by many, bought off expert witnesses and scientists per our expert witness Bill Battigate.

⑤) Lepkoski gives repetitive incomplete answers to Interrogate # 20, # 21, # 22, # 23, when these are very different questions/interrogations asked by Complainants!

With misspelling we have come to expect from Lepkoski, she responds incompletely, " See Met. Ed's response

Lepkoski does not answer "Who does" as in "Who does take ethics classes?" The VA in #38 is a Non-Answer in that there is no ethical compass for sickening Pennsylvanians.

- a) This is a prevarication.
- b) Lepkoski is depravely mendacious. to respond "Met Ed Joe had lie to its customers." Met Ed lied to Ms. Mousios in falsely claiming there was no radiation from the adjacent smart meter, when the radiation had already been documented and measured with a device.
- c) Judge Neep is violating both PA Code 52 5.349 and the end of discovery. See page 4. This is actionable with the PA, Judicial Board.

(7)

b) It is an actionable and unethical act that Judge Heep did not allow Complainants' adequate time to respond to Respondents' Objections of December 17, 2019. Judge Heep allowed Respondents' Objections two days later on December 19, 2019! This was unilateral and tantamount to ex parte communication. For Judge Heep to rule in favor of Respondents' Motion to Compel, with all the attendant mendacious, dissembling and plainly incomplete responses as well as ELBLEN Objections to Complainants' Interrogatories, would be worthy of Judge Heep, to lose her judgeship. As Heep knows, Complainants have been accruing

(8)
unscrupulous actions by Judge Keep
for the Judicial Review.

The ethically and grammar
challenged Respondents invoke

PA 52 code 5.371 quoting:

1) "A party fails to appear, answer
file sufficient answers, file objections."

For Met Ed to hypocritically propound
this code is

NOT APPLICABLE AS RESPONDENTS
FAILED TO FILE SUFFICIENT
ANSWERS, FILED FALSE AND
MISLEADING ANSWERS, MISQUOTE
COMPLAINANTS' INTERROGATORY
THEREBY FAILING TO PROPERLY
ANSWER, FILED BLANKET

Mousios & Cummins

ADD NON-RELEVANT AND MISLEADING ANSWERS AND OBJECTED TO NO FEWER THAN BLIVEN (11) INTERROGATORIES,

7) Furthermore, Complainants are NOT responsible for Respondents' illiterate spelling, terrible spelling and unintelligible syntax. Complainants cannot be expected to interpret Respondents' illiteracy and lack of proper spelling, punctuation and grammar

8) Discovery is ~~NOT~~ supposed to go up to the seventh hour, and DISCOVERY PROPERLY ENDED SEPTEMBER 2019

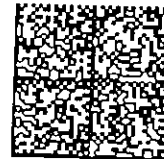
Nonetheless Submitted,
February 26, 2020

Liza Mousios

2/26/2020
Roy Cummins



Cumming
PO Box 396
Revere, PA 18953



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