

**DEBORAH ENGISCH-PLATT AND KIM PLATT
V.
Metropolitan Edison Company/Public Utility Commission**

DOCKET NO. C-2019-3013745

March 16, 2020

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Motion to stay hearing and all proceedings, until complainant's expert witness has ended his self-quarantine from the COVID-19 / Corona Virus disease.

- 1) Complainants expert witness, electrical engineer Bill Bathgate was scheduled to meet with the Platts at their home to measure the radiation and conductive emissions from their neighbors Smart Meters.
- 2) Mr. Bathgate would also opine on the dangers of Smart Meters in his written report. Given his erudition on the subject and his ability to accurately conduct such measurements.
- 3) Mr. Bathgate, is an older gentlemen and scholar, and does not wish to travel from Michigan to Pennsylvania, the latter a burgeoning hotbed of Corona Virus. He is self-quarantining to avoid exposure.
- 4) Mr. Bathgate is an eminent electrical engineer and scholar on the dangers of Smart Meters, having testified before the legislature numerous times.
- 5) Mr. Bathgate is uniquely qualified to be complainant's expert witness, in such a specialized field.
- 6) It should be noted that the utility company lawyer, Ward Smith, was granted a stay because of his fear of contracting the Corona Virus. This was at the Commonwealth Court level, but is still applicable.
- 7) Complainant's move to stay their case until such time as Mr. Bathgate feels he is out of danger, to exposure from the virus.

This has been respectfully submitted to the following parties:

CC: Rosemary Chiavetta
Tori L. Giesler
Administrative Law Judge Joel Cheskis

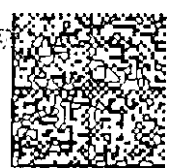
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