



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Office of Administrative Law Judge

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IN REPLY PLEASE
REFER TO OUR FILE

DATE: July 6, 2020
TO: Secretary Rosemary Chiavetta
FROM: Darlene D. Heep
Administrative Law Judge
SUBJECT: Roy Cumming and Liza Mousios Motions
C2019-3007989 and C2019 3007995

I am enclosing this Motion that I received in the above captioned proceeding. It has come to my attention that it was not filed with the Secretary. Please scan this document into InfoMAP at the above docket number and file it in the appropriate folder in the Secretary's Bureau.

Thank you.

Encl.

cc: Document file

Roy Cumming and Liza Mousios C2019-3337989and C2019 3007995

MOTION TO STAY

COMPLAINANTS Roy Cumming and Liza Mousios hereby file a motion to Stay for the following reasons:

1 In her fervor to exhibit her lack of impartiality and her reciprocity with the electric company, Judge Heep has refused to rule on Complainants' Motion to Compel First Energy's Answers to Interrogatories, while venally ordering components to answer interrogatories they had already answered.

2 Complainants hereby file a motion to stay in keeping with their rights to due process pending the outcome of the various APPEALS OF PETITIONERS PENDING ORAL ARGUMENTS ON OR AROUND JUNE 10TH, 2020:

A Maria Povasz v. Public Utility Commission No. 492 C.D. 2019

B Laura Sunstein Murphy 606 C.D. 2019

C Amicus Brief of Laura Sunstein Murphy { see above }

D Cynthia Randall and Paul Albrecht No. 607 C.D. 2019

E Mary Paul 460 C.D. 2019

F Evangeline Hoffman-Lorah 712 C.D. 2019

G Dr. and Dr. Alexia and Lawrence McKnight 1253 C.D. 2019

H Richard N. Meyers 1337 C.D. 2019

I Willard and Elsbeth Sunstein 1581 C.D. 2019

J Janice Denito Branagh 1857 C.D. 2019

K Orpheus and Kimberly Hanley 172 C.D. 2020

3 Complainants' expert witness, engineer Bill Bathgate lives in Michigan where the Corona virus is currently raging behind the peak of New York and New Jersey. Mr. Bathgate is sheltering in place, self-quarantining.

He is a specific scholar on the multitudinous health dangers of smart meters who has testified before the PA legislature, and his findings would be inimitable. He is unwilling to make the trip to Pennsylvania at this time given the current world pandemic. Judge Heep has demonstrated a frenetic resolute desire for complainants Cumming and Mousios to be unable to preserve their issues on appeal. Any ruling whereby complainants cannot do so because she wants to ram through a sham hearing while disallowing the ability of complainants to utilize their expert witness and preserve their issues on appeal when the virus actually wanes, would be further actionable judicial violation.

Complainants have no delusions of fairness in the reciprocal, solipsistic, venal scurrilous bedfellow relationship between the PUC and the electric companies. PUC is happy to have decimated Ms. Mousios' health and caused her homelessness because she could not live in her own home with the adjacent pernicious smart meter. PUC is delighted to have killed her dog and sickened four others. PUC is content with compromising Mr. Cumming's health and exacerbating a pre-cancerous condition that had been steadily improving pre-smart meter. We recognize your white color moral derangement and intrinsic evil, wrought of inexorable greed. Nevertheless, we must be allowed to preserve our issues on appeal.

Moreover, the spurious failure of Judge Heep to compel First Energy's Answers to Interrogatories and the reasonableness of allowing Complainant's motion to Stay pending the outcome of all the above petitioners is inherently compelling reason.

As Martin Luther King wrote, "The arc of justice is long but it bends toward justice".

Submitted,

Roy Cumming and Liza Mousios June 1, 2020

From: Roy Cumming <cumming@epix.net>

Subject: Motion for Recusal concomitant with Motion to Stay pending June 10th oral argument and ability of complainant's expert witness to come to Pennsylvania given his self-quarantine.

Date: June 4, 2020 at 5:26:25 PM EDT

To: cpell@pa.gov

1 In December 2019, Judge Heep granted the respondents' objections in three days, failing to allow time for the Complainants to file a response.

2 Judge Heep granted respondents' Motion to compel Complainants' Answers to Interrogatories despite the fact they were already answered by Cumming and Mousios per Respondents' inchoate, misspelled and nearly illiterate Interrogatories.

3 Judge Heep NEVER ruled on Complainants' Motion to Compel Respondent's Interrogatories.

4 To exhibit even worse corruption, Judge Heep ordered respondents to reply by June 5, 2020 WITHOUT ADDRESSING COMPLAINANTS' MOTION TO COMPEL RESPONDENTS' ANSWERS TO INTERROGATORIES AND ORDERING THEM TO ANSWER THEIR INTERROGATORIES SENT BY COMPLAINANTS AS SHE DID WITH THE COMPLAINANTS' ANSWERS.

5 IN FACT, IN THEIR MOST RECENT CORRESPONDENCE WITH JUDGE HEEP'S OFFICE, COMPLAINANTS REMINDED JUDGE HEEP THAT SHE HAD FAILED TO ADDRESS COMPLAINANTS' MOTION TO COMPEL RESPONDENT'S ANSWERS.

6 Judge Heep is a bastion of venal, unctuous, one-sided and non-impartial, scurrilous moral turpitude. Her actions are tantamount to ex parte corruption.

7 Every time Complainants decide to report her to the Judicial Board, Judge Heep displays a more flagrant, sordid bedfellow relationship with the electric company.

8 Complainants include and incorporate their previous Motion to Stay in this exegesis.

Roy Cumming and Liza Mousios June 4, 2020

cc. Tori Giesler

From: Roy Cumming <cumming@epix.net>
Subject: disqualification of corrupt judge
Date: June 24, 2020 at 4:55:30 PM EDT
To: cpell@pa.gov

Roy CummingC- 20193007989
Liza MousiosC 2019 3007995

Amended motion to disqualify Judge Heep

1 Judge Heep is incapable of impartiality. her briefs are replete with unilateral to the respondents such as "Respondent opposes this Motion". However, anything Complainants oppose is extirpated and denied.

2 Judge Heep writes "THE COMPLAINANTS HAVE BEEN PROVIDED MORE THAN AMPLE TIME TO DETERMINE WITNESSES AND PREPARE TESTIMONY". Complainants did not create the Covid 19 virus. Mr. Bathgate, their inimitably scholarly expert witness has been self-quarantining in Michigan, where the virus has been particularly virulent. He is unable to come and test the toxic adjacent meter which caused Ms. Mousios' homelessness, killed and sickened her dogs and sickened Mr. Cumming. Judge Heep's inane and insipid comment states "The Complainants have had ample time to determine witnesses and prepare testimony". Complainants do not have to DETERMINE WITNESSES'. Complainants have chosen Mr. Bathgate but he will not travel to Pennsylvania until August. Therefore, Heep is denying us an expert witness. Mr. Bathgate is back up as a result of the virus which Complainants did not create.

3 Judge Heep mendaciously states that there is no docket number for Complainants' Motion to Compel Respondents Mendacious, Non-Dissembling Answers to Interrogatories Propounded By Complainants". Unfortunately, for the PUC, Complainants have certified mail receipts for March 25, 2020 for both The Puc/Judge Heep and Tori Giesler/ First Energy. Complainants also have in their possession a copy of said Motion to Compel Respondents. This is abject venal corruption as there is no way neither Tori Giesler nor the PUC have their Motion and Complainants have proof.

4 Heep's mendacious averment that complainants have been provided due process and the ability to be heard is vacuous and venal. Heep is effectively denying our expert witness, wafylZaid by the virus. This is an appealable and actionable charge as are the others. We finally contacted the Judicial Disciplinary Board!

5 We realize we are human collateral in a paradigm of unadulterated evil.

Roy Cumming June 24, 2020
Liza Mousios

From: Roy Cumming <cumming@epix.net>
Subject: Amended Motion to Dismiss and demand for judge's ruling on Motion to compel Answers to Interrogatories of March 25th,2020.
Date: June 29, 2020 at 11:58:28 AM EDT
To: cpell@pa.gov

Roy Cumming and Liza Mousios
C-2019 3007995 and C-2019 3007989

Amended Motion to Dismiss and demand for Judge's Ruling on Complainants' Motion to Compel Answers to Interrogatories filed on March 25, 2020 with proof of certified mail receipt by PUC.

1 Judge Heep ordered Met Ed / Tori Giesler/ Respondents to file their brief by June 18, 2020. Now ELEVEN {11} DAYS LATER on June 29, 2020, no brief has been forthcoming to Complainants. Complainants would NEVER BE ALLOWED to propound such contumacy; in fact Heep will not even allow Complainants their expert witness Bill Bathgate, who due to delays and complications from the Corona Virus, cannot analyze the toxicity emanating from the adjacent smart meter until August. This is despite the fact that Complainants are not responsible for the miasma of problems incurred from the Corona virus. Complainants move to dismiss Respondents' case against Complainants in its entirety.

2 Complainants have in their possession proof of a copy of their Motion to Compel Answers to Interrogatories filed March 25, 2020 and a certified mail receipt from PUC, which Judge Heep venally claims has no docket number. {Complainants cannot scan these documents}. Judge Heep ruled previously that Complainants were required to answer Interrogatories which they had already answered. However, in keeping with the moral depravity and turpitude of the evil paradigm that comprises that sordid, incestuous relationship between the PUC and electric companies, not only has non one prevailed in PUC court despite incontrovertible scientific and medical evidence, judges are reduced to claiming their is no docket number when Complainants have proof of receipt of their Motion to Compel Met-Ed to answer Interrogatories. It should be noted that these are the same quasi-humans who would inveigh against Assad's chemical gassing of his own people, but are resolute in desecrating Complainants' liberties, constitutional rights and health. Therefore, Complaints move to exhort Judge Heep to rule on Complainants' Motion to Compel in the same way she ruled on Respondents' Motion to Compel.

Roy Cumming and Liza Mousios- homeless by state decree. June 29, 2020