

Deborah A. Redman  
414 Park Avenue  
Meadville, PA 16335  
Tel.: 814-853-3770  
(daredman@verizon.net)

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Monday, May 18, 2020

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North St.  
Keystone Bldg.  
Harrisburg, PA 17120

RECEIVED

MAY 18 2020

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

RE: Docket No. C-2019-301 3582, *Redman v. FirstEnergy, Penelec, & CEO Jones*  
***Submitted for filing:*** Complainant's Notice That Attorney for Penelec/FirstEnergy  
Has Broken Her Oath of Service

Dear Secretary Chiavetta,

Attached for filing is a copy of Complainant's Notice That Attorney for Penelec/  
FirstEnergy Has Broken Her Oath of Office.

Yours sincerely,

*Deborah A. Redman*

Dr. Deborah A. Redman

Encl.

cc: Attorney Margaret A. Morris  
Office of Administrative Law Judge

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~~MAY 19 2020~~  
~~PA PUBLIC UTILITY COMMISSION~~  
~~SECRETARY'S BUREAU~~

**BEFORE THE  
PA PUBLIC UTILITY COMMISSION**

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

DEBORAH A. REDMAN, \*

Complainant \*

No. C-2019-3013582

V. \*

FIRST ENERGY, PENELEC,  
and CHARLES E, JONES, JR.  
CEO, FirstEnergy Corp.  
76 Main St.  
Akron, OH 44308, \*

Respondents \*

Monday, 18 May 2020 (mailed)

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~~MAY 19 2020~~  
~~PA PUBLIC UTILITY COMMISSION~~  
~~SECRETARY'S BUREAU~~

**COMPLAINANT'S NOTICE THAT ATTORNEY FOR PENELEC/  
FIRST ENERGY HAS BROKEN HER OATH OF OFFICE**

Comes now Complainant Dr. Deborah A. Redman and states that the May 2020 Scheduling Order that she did not receive apparently required that the attorney for the energy companies Penelec and FirstEnergy, Margaret Morris, call her prior to the hearing. When on Monday, 11 May 2020, Attorney Morris called Dr. Redman, Attorney Morris acted so inappropriately that she violated her oath of office.

42 Pa Code §2522, oath of office, states in part that new attorneys swear that they "will use no falsehood, nor delay the cause of any person for lucre or malice."

Despite her oath, Attorney Morris called and said: "Everything is fixed? Your toilet has been unclogged?"

Dr. Redman, who did not know of the May 2020 Scheduling Order, was simply

incredulous. She said: "You think the toilet has unclogged itself? You think I haven't been unclogging toilets and sprayed with sewage for over a year ?

Attorney Morris, who interrupts and screams frequently during phone calls, indicated that she believed the landlord had fixed it.

Dr. Redman inquired if she had contacted the landlord and asked if the toilets were fixed. Dr. Redman indicated, "Between the two of us, we've spent over a hundred hours on the toilets," and asked her how the toilet clogs could be resolved when the wisteria problem had not been resolved.

Attorney Morris changes the subject when she does not want to answer a question and she did so then.

Dr. Redman, who believed there had been an agreement to e-mail her, asked Attorney Morris over and over to e-mail her with her concerns, reminding her that she was still too ill to speak to her or participate in a hearing.

Attorney Morris kept insisting that Dr. Redman had to e-mail the Judge.

When Dr. Redman said that Attorney Morris's phone was going in and out so she could not understand her, Attorney Morris abruptly and without warning hung up.

Later, Attorney Morris e-mailed Dr. Redman, but not to outline her concerns or provide a summary of the telephone conversation. She stated: "This will confirm that we spoke today pursuant to Judge Long's Prehearing Order that directed me to contact you. No issues were resolved during the call." As in the telephone conversation, she referred

to a Prehearing Order for a May hearing.

This is the way Attorney Morris has treated Dr. Redman in every phone conversation – spewing up falsehoods and distortions in an intimidating manner (raised voice, very pushy).

To act as if the wisteria problem had resolved itself and the real issue was just a clogged toilet that could easily be fixed is not honest and directly in violation of the lawyer's oath. Surely Attorney Morris does this to try to avoid compensating Dr. Redman for damages. And it is more than malicious to subject Dr. Redman (and her landlord) to unclogging toilets on a daily basis due to wisteria roots in the sewer system and thus to using a plunger, which aerosolizes the sewage water and causes splash-back onto her and her clothes. In other words, Dr. Redman (who is mobility impaired and chronically ill) is coated with sewage every time she has to unclog a toilet. hence at least daily, and is also weakened and destabilized from standing and exerting herself.<sup>1</sup>

WHEREFORE, Complainant requests that Attorney Morris's very inappropriate way of conducting herself as an attorney be reported to the Pennsylvania Office of Disciplinary Conduct.

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<sup>1</sup> Although this should be self-evident, Dr. Redman repeats that will never be able to participate in a hearing of any kind given that she is living in sewage. Sewage is not just repugnant. It is life-threatening, even for the healthy. Dr. Redman, who is chronically ill and immune-compromised, is very lucky to be alive.

RECEIVED

MAY 18 2020

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Yours respectfully,

Deborah A. Redman

Dr. Deborah A. Redman

414 Park Ave.

Meadville, PA 16335

Tel: 814-853-3770

**Monday, 18 May 2020 (put in U.S. mail)**

**Verification:** I, Deborah A. Redman, hereby state that the facts set forth above are true and correct to the best of my knowledge, information, and belief. I understand that the statements herein are made subject to the penalties of 18 Pa C.S. §4904 (relating to unsworn falsification to authorities).

Deborah A. Redman

Dr. Deborah A. Redman

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 18th day of May 2020 I served a copy of this Complainant's Notice That Attorney for Penelec/FirstEnergy Has Broken Her Oath of Office was served on the following by putting a copy in the U.S. mail, postage prepaid, to

Attorney Margaret A. Morris  
Reger Rizzo Darnall  
Cira Centre, 13<sup>th</sup> Fl.,  
2929 Arch St.  
Philadelphia, PA 19104

Pa Public Utility Commission  
Office of Administrative Law Judge  
Piatt Place, Suite 220  
301 Fifth Avenue  
Pittsburgh, PA 15222

PA Public Utility Commission  
Rosemary Chiavetta, Secretary  
400 North St.  
Keystone Bldg.  
Harrisburg, PA 17120

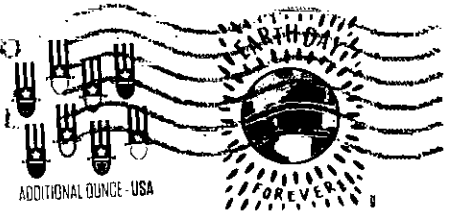
Deborah A. Redman

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