

From: [Hartman, Michael C](#)
To: angelgah@comcast.net
Subject: FW: Motion to Compel C-2019-3008272
Attachments: [PPL - Objections and Answers to Second Set of ROGs \(01510089x9F954\).pdf](#)
[image002.png](#)
[image004.png](#)

From: Hartman, Michael C
Sent: Tuesday, November 17, 2020 11:33 AM
To: Haas, Steve <sth@pa.gov>
Cc: 'Kimberly Krupka' <KKrupka@grossmcginley.com>
Subject: Motion to Compel C-2019-3008272

Your Honor,

On November 10, 2020, PPL furnished Objections and Limited Answers to our second set of Interrogatories dated June 2, 2020, attached.

Please accept this email as a Motion to Compel PPL to gather answers to the Interrogatories directed to Jonathan Scott, Kimberly Nettles and Robin Last Name Unknown (LNU), each an agent of PPL, from Scott, Nettles and Robin LNU.

Also, please compel PPL to furnish contact information to us for Kimberly Nettles, whom reportedly left PPL, and identify Robin LNU.

PPL has directed each, along with all other known and unknown contractors and subcontractors, not to discuss this matter with us. It is noted that PPL, to date, has refused our repeated informal and formal requests to identify the PPL contractors and subcontractors that excavated our property and removed vegetation, topsoil and mountain stone, on and off the ROW, in contradiction to the terms and spirit of the ROW Agreement and the E & S Plan filed with DCCD.

Furthermore, PPL has failed to Answer our First set of Interrogatories dated May 12, 2020, and failed to match/identify its Document Production material to our individual requests.

Sincerely yours,

Sharon and Michael Hartman

PPL's Objection:

INTERROGATORIES for Jonathan Scott, Kimberly Nettles and Robin LNU. Robin LNU accompanied Jonathan Scott and Mike Bush during an April 25, 2019 meeting at the site of the dispute.

Objection. These Interrogatories are directed to individuals who are not parties to the instant litigation. A party cannot be compelled to answer interrogatories on behalf of a non-party or produce documents in the hands of a non-party. See Pennsylvania Rule of Civil Procedure 4003.1. See also *Rohm and Haas Co. v. Lin*, 992 A.2d 132 (Pa. Super. 2010). Without waiving said objection, Respondent PPL Electric will answer such interrogatories to the extent such information is known by Respondent, PPL Electric.