**BEFORE THE**

**PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Glen Riddle Station, L.P. :

 :

 v. : C-2020-3023129

 :

Sunoco Pipeline, L.P. :

**ORDER**

**GRANTING MOTION FOR A PROTECTIVE ORDER**

On December 2, 2020, Glen Riddle Station, L.P. (Glen Riddle) filed a formal complaint with the Pennsylvania Public Utility Commission (Commission) against Sunoco Pipeline, L.P. (Sunoco), docket number C-2020-3023129. In its complaint, Glen Riddle averred that on or about May 13, 2020, Sunoco filed a Declaration of Taking in the Court of Common Pleas of Delaware County that concerned various portions of the Glen Riddle property that contains 124 residential dwelling units. Glen Riddle further averred that, in the taking action, Sunoco condemned temporary workspace easements and a temporary access road easement over their property for purposes of completing a pipeline project. Glen Riddle further averred that Sunoco is not complying with previous requirements of the Commission regarding a public awareness plan and standard operating procedures. Glen Riddle also identified several other alleged failures of Sunoco with regard to the property, including, parking and traffic safety concerns, unsafe work site, failure to follow government-mandated pandemic safety protocols, failure to communicate regarding a potentially hazardous leak, and structural and storm drainage concerns, among other things. Glen Riddle averred that Sunoco’s actions violated several provisions of the Public Utility Code and requested that the Commission enter an order enjoining or restraining Sunoco from engaging in further work at the property until the safety concerns are addressed. Glen Riddle attached multiple documents to its complaint in support of its position.

On December 23, 2020, Sunoco filed an answer and new matter in response to the complaint. In its answer, Sunoco admitted or denied the various averments Glen Riddle made in its complaint. In particular, Sunoco denied that it has not complied with the public awareness plan or standard operating procedures it is required to comply with. Sunoco also admitted or denied the various averments made by Glen Riddle with regard to the other alleged failures of Sunoco with regard to the property that were averred in the complaint. Sunoco provided significant detail in response to the averments made in the complaint and concluded by requesting that the complaint be dismissed with prejudice. Sunoco also attached multiple documents to its answer in support of its position.

In its new matter, which was accompanied by a notice to plead, Sunoco argued that the Commission lacks jurisdiction over Glen Riddle’s allegations regarding environmental law issues and permitting obligations, the validity and scope of easements and compliance with municipal ordinances and the Governor’s orders and regulations regarding Covid-19. Sunoco also argued that Glen Riddle has failed to state a claim upon which the Commission can grant relief. In part, Sunoco argued that Glen Riddle’s allegations regarding construction means and methods and relief seeking a work plan and schedule reflecting Glen Riddle’s preferences fail as a matter of law to state a claim upon which relief can be granted and should be dismissed.

Also on December 23, 2020, Sunoco filed preliminary objections in response to Glen Riddle’s complaint reiterating the arguments raised in new matter. Sunoco’s preliminary objections were granted in part and denied in part via an order dated January 28, 2021.

A hearing notice was issued on January 29, 2021 establishing an initial telephonic hearing for this matter for Wednesday, March 3, 2021 at 10:00 a.m. A prehearing order was issued on the same day setting forth various rules that would govern the hearing. On February 4, 2021, however, Sunoco filed a motion for a prehearing conference, revised procedural schedule and expedited response. Glen Riddle filed its answer to Sunoco’s motion on February 10, 2021. Sunoco’s motion was granted via order dated February 11, 2021. A hearing notice was issued on February 11, 2021 setting a call-in prehearing conference for Thursday, February 18, 2021 at 10:00 a.m.

However, on February 11, 2021, Glen Riddle filed a petition for interim emergency relief pursuant to Section 3.6 of the Commission’s regulations averring, among other

things, that Sunoco, without prior notice, posted signs warning that all areas within 100 yards of its worksite at Glen Riddle’s property fall within a “danger” area that must be avoided. A scheduling order dated February 12, 2021 was issued memorializing the agreement of the parties regarding litigation of the petition for emergency relief. On February 16, 2021, however, Glen Riddle filed a petition to withdraw the petition for interim emergency relief. The petition to withdraw was jointly executed by counsel for both Glen Riddle and Sunoco. The petition for leave to withdraw the petition for interim emergency relief was granted via Initial Decision dated February 18, 2021 leaving the underlying complaint ready for adjudication.

As a result, a hearing notice was issued on February 17, 2021 cancelling the hearing on the petition for interim emergency relief scheduled for February 18, 2021 and rescheduling the prehearing conference for the underlying complaint for Friday, February 26, 2021 at 10:00 a.m. A prehearing order was issued on February 17, 2021 regarding that prehearing conference.

The further prehearing conference was held on February 26, 2021, as scheduled. A scheduling order was issued on February 26, 2021 memorializing the agreements reached at the further prehearing conference.

On March 2, 2021, Sunoco filed a motion for a protective order. In its motion, Sunoco argued that the parties have exchanged discovery regarding material alleged to be proprietary but have been unable to agree on the treatment of such material. As a result, Sunoco filed the instant motion with a proposed protective order. Sunoco argued that its proposed protective order aligns with years of previously implemented protective orders before the Commission in complaint and rate proceedings. Sunoco stated that it, Glen Riddle and the Commission have a duty to protect proprietary, confidential and notably confidential security information from disclosure. Sunoco then argued that proprietary information as defined by the Commission may be presented during the course of this proceeding which justifies the issuance of a protective order because unrestricted disclosure of such information would not be in the public interest. Sunoco applies the least restrictive means of limitation that will provide the necessary protections from disclosure. Sunoco argued, therefore, that its motion should be granted.

On March 4, 2021, Glen Riddle filed an answer to Sunoco’s motion. In its answer, Glen Riddle argued that Sunoco waived its right to a protective order when it failed to file its motion within 14 days of service of Glen Riddle’s discovery requests and that the Commission has no discretion to waive that deadline. Glen Riddle argued that Sunoco cannot refuse to respond to Glen Riddle’s discovery requests based on confidentiality or propriety. Sunoco also argued that the protective order proposed by Sunoco permits Sunoco to mark information proprietary or confidential that is well beyond the scope of what is permitted by the Commission’s regulations or the Public Utility Confidential Security Information Disclosure Protection Act. Glen Riddle stated that Sunoco’s proposed protective order does not balance the interests of the parties, the public, and the Commission, nor does it apply the least restrictive means of limitation, because it allows Sunoco to withhold information beyond that which is protected by law. Glen Riddle offered a separate protective order that it averred aligns with the Commission’s regulations.

Sunoco’s motion for a protective order is ready for disposition. For the reasons discussed below, Sunoco’s motion will be granted.

As an initial matter, the Commission’s Rules of Practice and Procedure permit the Commission to issue protective orders limiting the availability of certain proprietary or confidential information. 52 Pa. Code §§ 5.362 and 5.365. The party seeking the protective order has the burden to establish that the potential harm to the party of providing the information would be substantial and the harm to the party if the information is disclosed without restriction outweighs the public’s interest in free and open access to the administrative hearing process. Petition for Protective order of GTE North Inc., 1996 Pa PUC LEXIS 95, Docket No. G-00940402, Order (entered August 8, 1996); ITT Communications Services’ Petition for a Protective Order, 1991 Pa PUC LEXIS 193, Docket No. R-912017, Order (entered November 5, 1991). If that burden is satisfied, the least restrictive means of limitation which will provide the necessary protection from disclosure will be applied. 52 Pa. Code § 5.365(a).

In considering whether to issue a protective order, the Commission, pursuant to Section 5.365(a), should consider the following factors:

(1)  The extent to which the disclosure would cause unfair economic or competitive damage.

(2)  The extent to which the information is known by others and used in similar activities.

(3)  The worth or value of the information to the party and to the party’s competitors.

(4)  The degree of difficulty and cost of developing the information.

(5)  Other statutes or regulations dealing specifically with disclosure of the information.

52 Pa. Code § 5.365(a). The Commission’s regulations further provide detail regarding restrictions placed on the proprietary material, access to proprietary material by representatives of parties, special restrictions and the return of proprietary information at the conclusion of the proceeding. 52 Pa. Code §§ 5.365(c)-(g).

Section 5.365, however, must be balanced against Commission regulations that also provide that the Commission’s records, including the record of this proceeding, may be accessed by the public pursuant to 52 Pa. Code §§ 1.71-1.77. In particular, Section 1.71 of the Commission’s regulations provides: “The Commission’s record maintenance system is intended to provide for the greatest degree of public access to Commission documents that is consistent with the exercise of the functions of the Commission under the act and other applicable laws.” 52 Pa. Code § 1.71. In addition, the interests of keeping material proprietary or confidential must be viewed in light of the Pennsylvania Right to Know Law. 65 P.S. § 67.102.

In this case, Sunoco has proposed what it has termed the Commission’s “standard” protective order. In fact, the protective order proposed by Sunoco is substantially similar, although not identical, to the initial protective order used in Flynn, *et al.* v. Sunoco Pipeline, L.P., Docket Nos. C-2018-3006116, *et al*. (Protective Order dated November 28, 2019). The need for a protective order to govern the treatment of information alleged to be proprietary in this proceeding is clear. There have been other proceedings involving the pipeline at issue in this proceeding and it is evident from those proceedings that a protective order in this proceeding is appropriate. Furthermore, the protective order proposed by Sunoco appears to balance the need to protect certain information from public disclosure while providing the greatest degree of public access to Commission records by applying the least restrictive means of limitation which will provide the necessary protection from disclosure. As a result, Sunoco’s motion for a protective order will be granted.

Glen Riddle’s arguments against the protective order proposed by Sunoco are without merit and will be rejected. In particular, Glen Riddle’s argument that Sunoco has somehow waived its right to a protective order in this case when it failed to file the motion within 14 days from when Glen Riddle served its discovery will be rejected. Section 5.365(c) of the Commission’s regulations requires that the party claiming the privilege shall file a petition for protective order within 14 days of the date the request for information was received and, prior to the issuance of a protective order, a party may not refuse to provide information. 52 Pa.Code § 5.365(c)(4). However, Sunoco explained its efforts to file for a protective order within the 14 day period, including reaching out to Glen Riddle to discuss the matter. This averment was supported by the attachment of a string of emails between the parties. The public interest in this case requires where public safety issues are raised, coupled with the potential to maintain certain aspects of the record confidential, warrants granting Sunoco’s motion in this case.

Sunoco’s actions do not warrant finding that Sunoco has waived its right to a protective order in this case. To the extent that the delay in filing of a motion for a protective order has caused a party substantive harm, that issue can be addressed in other ways and the parties are free make such motions as they deem necessary. The answer, however, is not to prohibit protecting from disclosure information alleged to be proprietary in this proceeding.

Similarly, the substantive arguments regarding modifications to Sunoco’s proposed protective order raised by Glen Riddle is without merit. For example, with regard to Glen Riddle’s arguments regarding the treatment of confidential security information as highly confidential, this argument contradicts the Commission’s regulations which allow for special restrictions for information where “the party whom the information is sought demonstrates that a greater restriction is necessary to avoid severe and extreme prejudice” and the provision of an additional layer of protection for information designated as confidential security information. *Compare*, 52 Pa.Code § 5.365(e) and 52 Pa.Code § 5.365(g). As such, the treatment of highly confidential material and confidential security information proposed in Sunoco’s protective order is reasonable and Glen Riddle’s argument to the contrary will be rejected.

Most importantly, the protective proposed by Sunoco allows parties to question or challenge the confidential nature or proprietary nature of particular material and to question the admissibility of such material. The party challenging the designation of a document or information as proprietary retains the burden of demonstrating that the designation is appropriate. This is an essential element of the protective order that ensures that the appropriate protections are being provided while still maintaining the necessary public access to the Commission’s records and address Glen Riddle’s concerns that the protective order proposed by Sunoco provides Sunoco with too much discretion.

As a result, the protective order proposed by Sunoco will be adopted for this proceeding and the concerns raised by Glen Riddle will be denied. The proposed protective order is consistent with the Commission’s regulations regarding protective orders. This proceeding involves information that warrants protection and the proposed protective order provides the least restrictive means of limitation which will provide the necessary protection from disclosure. The parties are advised, however, to minimize the amount of information alleged to be proprietary that is admitted into the record to increase the likelihood that the ultimate decision of the Commission in this matter provides the greatest degree of public access, consistent with the Commission’s regulations. This is especially true with regard to confidential security information.

ORDER

THEREFORE,

IT IS ORDERED:

1. The Motion is hereby granted with respect to all materials and information identified in Paragraphs 2 – 3 below that have been or will be filed with the Commission, produced in discovery, or otherwise presented during the above-captioned proceedings and all proceedings consolidated therewith.
2. The information subject to this Protective Order is all correspondence, documents, data, information, studies, methodologies and other materials, furnished in these proceedings, which are believed by the producing party to be of a proprietary or confidential nature and which are so designated by being marked “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL PROTECTED MATERIAL.” Such materials will be referred to below as “Proprietary Information.” When a statement or exhibit is identified for the record, the portions thereof that constitute Proprietary Information shall be designated as such for the record.
3. This Protective Order applies to the following categories of materials: (a) the parties may designate as “CONFIDENTIAL” those materials that customarily are treated by that party as sensitive or proprietary, which are not available to the public, and which, if disclosed freely, would subject that party or its clients to risk of competitive disadvantage or other business injury; (b) the parties may designate as “HIGHLY CONFIDENTIAL PROTECTED MATERIAL” those materials that are of such a commercially sensitive nature among the parties or of such a private, personal nature that the producing party is able to justify a heightened level of confidential protection with respect to those materials, or Confidential Security Information pursuant to the Public Utility Confidential Security Information Disclosure Protection Act (35 P.S. §§ 2141.1 to 2141.6). Moreover, information subject to protection under the Public Utility Confidential Security Information Disclosure Protection Act (35 P.S. §§ 2141.1 to 2141.6) and PUC Regulations at 52 Pa. Code §§ 102.1-102.4 will also be designated as “HIGHLY CONFIDENTIAL PROTECTED MATERIAL.” Pursuant to the Commission’s rules regarding the handling of Confidential Security Information, no information subject to protection under the Public Utility Confidential Security Information Disclosure Protection Act (35 P.S. §§ 2141.1 to 2141.6) and PUC Regulations at 52 Pa. Code §§ 102.1-102.4 will be provided electronically to the Commission, Administrative Law Judge, Secretary’s Bureau, or any other Commission staff, and such information must be filed with the Commission in hard copy only. The parties shall endeavor to limit their designation of information as Highly confidential PROTECTED MATERIAL.
4. Proprietary Information shall be made available to counsel for a party, subject to the terms of this Protective Order. Such counsel shall use or disclose the Proprietary Information only for purposes of preparing or presenting evidence, cross examination, argument, or settlement in these proceedings. To the extent required for participation in these proceedings, counsel for a party may afford access to Proprietary Information subject to the conditions set forth in this Protective Order.
5. Information deemed as “CONFIDENTIAL” shall be made available to a “Reviewing Representative” who is a person that has signed a Non-Disclosure Certificate attached as Appendix A, and who is:

 (i) An attorney who has entered an appearance in these proceedings for a party;

 (ii) Attorneys, paralegals, and other employees associated for purposes of this case with an attorney described in Paragraph 5(i);

 (iii) An expert or an employee of an expert retained by a party for the purpose of advising, preparing for or testifying in these proceedings; or

1. Employees or other representatives of a party appearing in these proceedings with significant responsibility for this docket.
2. Information deemed as “HIGHLY CONFIDENTIAL PROTECTED MATERIAL”, may be provided to a “Reviewing Representative” who has signed a Non-Disclosure Certificate attached as Appendix A and who is:

 (i) An attorney for a statutory advocate pursuant to 52 Pa. Code §1.8 or a counsel who has entered an appearance in these proceedings for a party;

 (ii) An attorney, paralegal, or other employee of an attorney for purposes of this case with an attorney described in Paragraph (i); or

 (iii) An outside expert or an employee of an outside expert retained by a party for the purposes of advising, preparing for or testifying in these proceedings.

Provided, further, that in accordance with the provisions of Sections 5.362 and 5.365(e) of the Commission’s Rules of Practice and Procedure, 52 Pa. Code §§ 5.362, 5.365(e), any party may, by subsequent objection or motion, seek further protection with respect to HIGHLY CONFIDENTIAL PROTECTED MATERIAL, including, but not limited to, total prohibition of disclosure or limitation of disclosure only to particular persons or parties.

1. For purposes of this Protective Order, a Reviewing Representative may not be a “Restricted Person.”

 (a) A “Restricted Person” shall mean: (i) an officer, director, stockholder, partner, or owner of any competitor of the parties or an employee of such an entity if the employee’s duties involve marketing or pricing of the competitor’s products or services; (ii) an officer, director, stockholder, partner, or owner of any affiliate of a competitor of the parties (including any association of competitors of the parties) or an employee of such an entity if the employee’s duties involve marketing or pricing of the competitor's products or services; (iii) an officer, director, stockholder, owner or employee of a competitor of a customer of the parties if the Proprietary Information concerns a specific, identifiable customer of the parties; and (iv) an officer, director, stockholder, owner or employee of an affiliate of a competitor of a customer of the parties if the Proprietary Information concerns a specific, identifiable customer of the parties; provided, however, that no expert shall be disqualified on account of being a stockholder, partner, or owner unless that expert’s interest in the business would provide a significant motive for violation of the limitations of permissible use of the Proprietary Information. For purposes of this Protective Order, stocks, partnership or other ownership interests valued at more than $10,000 or constituting more than a 1% interest in a business establishes a significant motive for violation.

 (b) If an expert for a party, another member of the expert’s firm or the expert’s firm generally also serves as an expert for, or as a consultant or advisor to, a Restricted Person, said expert must: (i) identify for the parties each Restricted Person and each expert or consultant; (ii) make reasonable attempts to segregate those personnel assisting in the expert’s participation in this proceeding from those personnel working on behalf of a Restricted Person; and (iii) if segregation of such personnel is impractical the expert shall give to the producing party written assurances that the lack of segregation will in no way jeopardize the interests of the parties or their customers. The parties retain the right to challenge the adequacy of the written assurances that the parties’ or their customers’ interests will not be jeopardized. No other persons may have access to the Proprietary Information except as authorized by order of the Commission.

8. A qualified “Reviewing Representative” for “HIGHLY CONFIDENTIAL PROTECTED MATERIAL” may review and discuss “HIGHLY CONFIDENTIAL PROTECTED MATERIAL” with their client or with the entity with which they are employed or associated, to the extent that the client or entity is not a “Restricted Person”, but may not share with or permit the client or entity to review the “HIGHLY CONFIDENTIAL PROTECTED MATERIAL.” Such discussions must be general in nature and not disclose specific “HIGHLY CONFIDENTIAL PROTECTED MATERIAL.”

1. Information deemed Proprietary Information shall not be used except as necessary for the conduct of these proceedings, nor shall it be disclosed in any manner to any person except a Reviewing Representative who is engaged in the conduct of these proceedings and who needs to know the information in order to carry out that person’s responsibilities in these proceedings.
2. Reviewing Representatives may not use information contained in any Proprietary Information obtained through these proceedings to give any party or any competitor or customer or consignee of any party a commercial advantage. In the event that a party wishes to designate as a Reviewing Representative a person not described in Paragraphs 5(i) through 5(iv) or 6(i) through 6(iii) above, the party shall seek agreement from the party providing the Proprietary Information. If an agreement is reached, that person shall be a Reviewing Representative pursuant to Paragraph 6(iv) above with respect to those materials. If no agreement is reached, the party shall submit the disputed designation to the presiding Administrative Law Judge for resolution.
3. (a) A Reviewing Representative shall not be permitted to inspect, participate in discussions regarding, or otherwise be permitted access to Proprietary Information pursuant to this Protective Order unless that Reviewing Representative has first executed a Non-Disclosure Certificate provided that if an attorney qualified as a Reviewing Representative has executed such a certificate, the paralegals, secretarial and clerical personnel under the attorney's instruction, supervision or control need not do so. A copy of each Non-Disclosure Certificate shall be provided to counsel for the parties asserting confidentiality prior to disclosure of any Proprietary Information to that Reviewing Representative.

 (b) Attorneys and outside experts qualified as Reviewing Representatives are responsible for ensuring that persons under their supervision or control comply with the Protective Order.

1. None of the parties waive their right to pursue any other legal or equitable remedies that may be available in the event of actual or anticipated disclosure of Proprietary Information.
2. The parties shall designate data or documents as constituting or containing Proprietary Information by marking the documents “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL PROTECTED MATERIAL.” Where only part of data compilations or multi-page documents constitutes or contains Proprietary Information, the parties, insofar as reasonably practicable within discovery and other time constraints imposed in these proceedings, shall designate only the specific data or pages of documents which constitute or contain Proprietary Information. The Proprietary Information shall be served upon the parties hereto only in an envelope separate from the nonproprietary materials, and the envelope shall be conspicuously marked “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL PROTECTED MATERIAL.”
3. The parties will consider and treat the Proprietary Information as within the exemptions from disclosure provided in Section 335(d) of the Public Utility Code, 66 Pa. C.S. § 335(d), and the Pennsylvania Right-to-Know Act, 65 P.S. §§ 67.101 *et seq.*, until such time as the information is found to be non-proprietary. In the event that any person or entity seeks to compel the disclosure of Proprietary Information, the non-producing party shall promptly notify the producing party in order to provide the producing party an opportunity to oppose or limit such disclosure.
4. Any public reference to Proprietary Information by a party or its Reviewing Representatives shall be to the title or exhibit reference in sufficient detail to permit persons with access to the Proprietary Information to understand fully the reference and not more. The Proprietary Information shall remain a part of the record, to the extent admitted, for all purposes of administrative or judicial review.
5. Part of any record of these proceedings containing Proprietary Information, including but not limited to all exhibits, writings, testimony, cross examination, argument, and responses to discovery, and including reference thereto as mentioned in Paragraph 15 above, shall be sealed for all purposes, including administrative and judicial review, unless such Proprietary Information is released from the restrictions of this Protective Order, either through the agreement of the parties to this proceeding or pursuant to an order of the Commission.
6. The parties shall retain the right to question or challenge the confidential or proprietary nature of Proprietary Information and to question or challenge the admissibility of Proprietary Information. If a party challenges the designation of a document or information as proprietary, the party providing the information retains the burden of demonstrating that the designation is appropriate.
7. The parties shall retain the right to question or challenge the admissibility of Proprietary Information; to object to the production of Proprietary Information on any proper ground; and to refuse to produce Proprietary Information pending the adjudication of the objection.
8. Within 30 days after a Commission final order is entered in the above-captioned proceedings, or in the event of appeals, within thirty days after appeals are finally decided, the parties, upon request, shall either destroy or return to the parties all copies of all documents and other materials not entered into the record, including notes, which contain any Proprietary Information. In the event that a party elects to destroy all copies of documents and other materials containing Proprietary Information instead of returning the copies of documents and other materials containing Proprietary Information to the parties, the party shall certify in writing to the other producing party that the Proprietary Information has been destroyed.

Dated: March 5, 2021 /s/

 Joel H. Cheskis

 Deputy Chief Administrative Law Judge

**BEFORE THE**

**PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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| GLEN RIDDLE STATION, L.P. v.SUNOCO PIPELINE L.P.  | ::::: | C-2020-3023129  |

**NON-DISCLOSURE CERTIFICATE**

**TO WHOM IT MAY CONCERN:**

The undersigned is the \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (the retaining party). The undersigned has read and understands the Protective Order deals with the treatment of Proprietary Information, and the undersigned is a (check ONE):

€ Reviewing Representative for CONFIDENTIAL information.

€ Reviewing Representative for CONFIDENTIAL & HIGHLY CONFIDENTIAL information.

The undersigned agrees to be bound by and comply with the terms and conditions of said Protective Order.

 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 Name

 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 Signature

 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 Address

Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 Employer

**C-2020-3023129 - GLEN RIDDLE STATION, L.P. v. SUNOCO PIPELINE L.P.***updated 3/3/21*

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