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*"The difficult legal challenges we  
complete immediately; the impossible  
ones take a little longer."*

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July 14, 2021

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**RE: 600 Scranton, LLC v. PPL Electric Utilities Corp  
Docket No.: C-2019-3014952**

Dear Ms. Chiavetta:

Enclosed for eFiling in the above-captioned matter is the Complainant's Reply to Respondent's Answer to Complainant's Motion for Continuance of July 22, 2021 Hearing. Please note that this filing was eFiled with the Commission on today's date.

If you have any questions or concerns, please do not hesitate to contact me. Thanking you for your attention hereto, I am,

Very truly yours,  
**THOMAS J. JONES, JR. P.C.**



Thomas J. Jones, Jr., Esquire  
Attorney for Complainant  
600 Scranton, LLC

TJJ,Jr./rf  
Enclosures

cc: Administrative Law Judge Dennis J. Buckley (w/enc) via email only  
Kimberly Krupka, Esquire (w/enc) via email only  
600 Scranton, LLC (w/enc) via email only

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**600 SCRANTON LLC**

**V.**

**PPL ELECTRIC UTILITIES CORPORATION  
C-2019-3014952**

**COMPLAINANT'S REPLY TO RESPONDENT'S OPPOSITION  
TO MOTION FOR CONTINUANCE**

AND NOW comes Thomas J. Jones, Jr., Esq. Counsel for the Complainant, 600 Scranton, LLC, in the above captioned case currently before the Public Utility Commission and Administrative Law Judge, Dennis J. Buckley and brings forth the Complainant's Reply to Respondent's Answer in Opposition to the Motion for Continuance and setting forth the following in support thereof:

1. On July 8, 2021, Complainant filed and served upon Respondent's counsel a Motion for Continuance of the Hearing scheduled for July 22, 2021, as a result of the delay for completion of formal discovery; specifically, the inability to take the deposition and receive the documents requested from PPL Billing Account Manager, Brian Stafford.

2. Complainant had communication with Respondent's counsel to schedule an in-person deposition of Mr. Stafford at the office of counsel for Complainant in Scranton, and to bring with him the requested documents for inspection and to make photocopies. Complainant's counsel assured Respondent's counsel the office was set up to ensure Covid 19 protocol and that all in attendance had received their second shot of the Covid vaccine.

3. Respondent's counsel and Complainant's counsel had scheduling difficulties to arrange a convenient time for the deposition and the production of the requested documents and it was finally agreed to be arranged for a date certain prior to the

Prehearing Order of the presiding ALJ, Buckley to produce Hearing Exhibits on or before July 16, 2021, that being, Friday, July 9, 2021 at 9:00am

4. On July 8, 2021, for the first time since the deposition was scheduled to take place, Respondent's counsel informed counsel for the Complainant that an in-person deposition and the production of the requested documents could not take place but could be accomplished by a zoom conference call.

5. Thereafter at 2:12 p.m. on July 8, 2021, counsel for Respondent sent an email to counsel for Complainant after he had cancelled the deposition due to the personal unavailability of the deponent and informed his court reporter of the same, informing him that Mr. Stafford would, in fact, be available afterwards for an in-person deposition on July 9, 2021, which email counsel for Complainant did not see until approximately 5:00 p.m. that day as he was in court in Wayne County. However, by this time, the deposition had been cancelled.

6. Counsel for Complainant had been diligent in his efforts to gain a deposition date and has a long string of email communications to document the same. At this point there is simply no time to secure a transcript which is required to be submitted by July 16, 2021 and deposition without the ability of the same to be reviewed by my client.

7. An in-person deposition previously agreed to was necessary for the production of documents to question the deponent and to reproduce the documents for submission as exhibits for the scheduled hearing.

8. Complainant is prejudiced by the delay and inability for the parties to arrange the deposition and receipt of the requested documents to submit as exhibits, as well as receipt of the stenographic transcript of the deposition by the court stenographer.

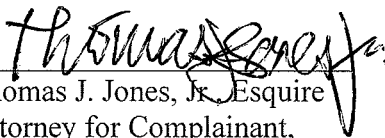
9. A continuance of the scheduled July 22, 2021, hearing for a thirty (30) day period will prejudice no one and will permit Complainant to properly depose an essential witness and obtain the necessary documents for introduction into the record at hearing.

10. There also exists the unresolved issue of Complainant's filed Motion to Compel Respondent's Response to Complainant's First and Second Set of Interrogatories and Request for Production of Documents filed on May 28, 2021.

WHEREFORE it is respectfully requested that the hearing scheduled for July 22, 2021, be continued for thirty (30) days to permit the discovery to be concluded and Exhibits to be prepared for submission at hearing.

Respectfully submitted,

**THOMAS J. JONES, JR., P.C.**

  
Thomas J. Jones, Jr. Esquire  
Attorney for Complainant,  
600 Scranton, LLC

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

600 SCRANTON, LLC	:	
Complainant	:	
v.	:	C-2019-3014952
PPL ELECTRIC UTILITIES CORPORATION	:	
Respondent	:	

CERTIFICATE OF SERVICE


I, Thomas J. Jones, Jr., Esquire, hereby certify that I have served the foregoing Complainant's Reply to Respondent's Opposition to Motion for Continuance, upon the individuals electronically at the addresses set forth below.

Honorable Dennis Buckley  
Administrative Law Judge  
Pa. Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
[debuckley@pa.gov](mailto:debuckley@pa.gov)

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July 14, 2021

Thomas J. Jones, Jr., P.C.

  
Thomas J. Jones, Jr., Esquire  
Attorney for Plaintiff  
600 Scranton, LLC