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December 10, 2021

**Via Electronic Filing**

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

Re: Kathleen C. Babyak v. Full Service Network, LP  
Docket No. C-2021-3024569

Dear Secretary Chiavetta:

Enclosed for electronic filing please find a Motion for Continuance on behalf of Full Service Network, LP in the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

*/s/ Lauren M. Burge*  
Lauren M. Burge

Enclosure

cc: Cert. of Service w/enc.  
nmiskanic@pa.gov

**CERTIFICATE OF SERVICE**

I hereby certify that this day I served a copy of Full Service Network, LP's Motion for Continuance upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

**Via First Class Mail**

Kathleen Babyak  
149 Oak Ridge Rd.  
Acme, PA 15610

**Via Email Only**

Hon. Jeffrey A. Watson  
Administrative Law Judge  
PA Public Utility Commission  
Piatt Place  
301 5<sup>th</sup> Avenue, Suite 220  
Pittsburgh, PA 15222  
jeffwatson@pa.gov

Dated: December 10, 2021

*Lauren M. Burge*

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Lauren M. Burge, Esq.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Kathleen C. Babyak,	:	
	Complainant	:
	:	
v.	:	Docket No. C-2021-3024569
	:	
Full Service Network, LP,	:	
	Respondent	:
	:	

**MOTION FOR CONTINUANCE**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE JEFFREY WATSON:

Full Service Network, LP (“FSN”) files this Motion for Continuance, pursuant to Section 1.15 of the Pennsylvania Public Utility Commission’s (“PUC” or “Commission”) regulations, 52 Pa. Code § 1.15. In support of this Motion, PWSA avers as follows:

1. On February 3, 2021, Kathleen C. Babyak (“Complainant”) filed a Formal Complaint against FSN at the Commission.
2. On May 3, 2021, FSN filed an Answer with New Matter and Preliminary Objections.
3. On June 11, 2021, an Order denying FSN’s Preliminary Objections was entered by Administrative Law Judge Jeffrey Watson (“ALJ”).
4. A telephonic hearing was initially scheduled for October 5, 2021. ALJ Watson granted a continuance of this hearing on October 1, 2021, which was unopposed.
5. By hearing notice dated December 8, 2021, a telephonic hearing was scheduled on the Complaint for January 11, 2022 at 10:00 a.m. Hearing exhibits are due five (5) business days in advance of the hearing, on January 4, 2022.
6. Counsel for FSN has another hearing scheduled before the PUC during the same date and time on January 11, 2022. This hearing requires the participation of FSN’s counsel.

Counsel has already undertaken the preparation for both hearings and has engaged in settlement discussions with the Complainant. As such, it would not be cost efficient for either client to assign representation for either matter to other counsel.

7. Requests for continuance may be granted by the presiding officer “for good cause” under Section 1.15 of the Commission’s regulations, 52 Pa. Code § 1.15.

8. FSN submits that the scheduling conflict of its counsel is “good cause” for granting a continuance.

WHEREFORE, Full Service Network, LP respectfully requests that ALJ Watson grant this Motion for Continuance and reschedule the hearing on the Formal Complaint to another mutually convenient date and time. (This request includes a new deadline for the filing of hearing exhibits.)

Respectfully submitted,

*/s/ Lauren M. Burge*

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Dated: December 10, 2021

Attorneys for  
Full Service Network, LP