

KEVIN M. WALSH, ESQUIRE
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ATTORNEY FOR JOSEPH BURNS

| | | |
|-------------------------------|---|----------------------------------|
| JOSEPH BURNS | : | BEFORE THE PENNSYLVANIA |
| | : | PUBLIC UTILITY COMMISSION |
| | : | |
| v. | : | |
| | : | |
| PPL ELECTRIC UTILITIES | : | |
| CORPORATION. | : | C-2021-3029372 |

MOTION FOR CONTINUANCE

Joseph Burns respectfully mover for a continuance of the initial telephonic hearing scheduled for Wednesday January 5, 2022 at 10:00 a.m. and in support hereof is the following:

1. Unexpectedly, Coleen Burns was admitted to the hospital Covid positive and then released this Sunday with isolation for ten (10) days.
2. This matter concerns her averred prior balance. Coleen Burns' has material information to present and is specifically referenced in PPL's Answer several times.
3. Proceeding without Coleen Burns would greatly prejudice Joseph Burns.
4. Concurrence. The undersigned counsel, Kevin Walsh, Esquire, certifies he sought via telephone message concurrence from PPL's counsel to this requested continuance, but he did not hear back from PPL's counsel before this Motion was filed.

WHEREFORE, Plaintiff respectfully requests that the initial telephonic hearing scheduled for Wednesday January 5, 2022 at 10:00 a.m. be continued together with such other and further relief as this court deems just and appropriate.

KEVIN M. WALSH, ESQUIRE

Attorney for Joseph Burns

297-299 Pierce Street

Kingston, PA 18704

(570) 283-3041

(570) 283-2778 fax

A Certificate of Service is attached.

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MOTION FOR CONTINUANCE
CERTIFICATE OF SERVICE

I, Kevin M. Walsh, Esquire, hereby certify that I forwarded a true and correct copy of the foregoing Motion to the below named by U.S. first class mail, postage pre-paid, on the ___3rd___ day of Jan. 2021, addressed as follows:

Kimberly G Krupa, Esquire
33 S Seventh Street
P O Box 4050
Allentown, PA 18105 and by email to kkrupka@grossmcginley.com

Administrative Law Judge John M Coogan – via email at jcoogan@pa.gov

cc: Joseph Burns
cc: Coleen Burns .

Kevin M. Walsh, Esquire
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