



February 22, 2022

**VIA E-FILING**

**David P. Zambito**

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Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2 North – Filing Room  
Harrisburg, PA 17120

**RE: Pennsylvania Public Utility Commission, Bureau of Investigation and Enforcement v. Westover Property Management Company, L.P. d/b/a Westover Companies; Docket No. C-2022-3030251**

**Agreement to Extend Discovery Deadlines**

Dear Secretary Chiavetta:

On February 10, 2022, the Bureau of Investigation and Enforcement (“I&E”) filed and served objections to certain Interrogatories and Requests for the Production of Documents Propounded by Westover Property Management Company, L.P. d/b/a Westover Companies (“Westover”). 52 Pa. Code § 5.342(g) requires Westover to file a Motion to Compel within ten days (*i.e.*, by February 22, 2022) or the objected-to interrogatories will be deemed withdrawn.

This correspondence is to advise the Pennsylvania Public Utility Commission (“Commission”) that I&E and Westover are in negotiations to resolve their discovery dispute, but need more time to resolve their dispute. The parties have agreed that I&E will respond to Westover’s latest proposal by noon on February 25, 2022, and the deadline for Westover to file a Motion to Compel is extended until the close of business on Wednesday, March 2, 2022.

Counsel for I&E has reviewed this correspondence and has authorized the undersigned to represent to the Commission that I&E has agreed to the above-described proposal.

Copies of this correspondence have been served as shown on the attached Certificate of Service.

Please contact me if you have any question regarding this filing. Thank you for your attention to this matter.

Sincerely,

COZEN O'CONNOR



By: David P. Zambito

Counsel for *Westover Property Management, L.P.*  
*d/b/a Westover Companies*

DPZ:kmg  
Enclosures

cc: Per Certificate of Service  
Peter Quercetti, Vice President of Operations Management, Westover Companies  
Alexander Stefanelli, CFO, Westover Companies

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,  
Bureau of Investigation and Enforcement

v.

Westover Property Management Company, L.P.  
d/b/a Westover Companies

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Docket No. C-2022-3030251

**CERTIFICATE OF SERVICE**

I hereby certify that I have this 22nd day of February, 2022 served a true copy of the foregoing **Correspondence regarding Agreement to Extend Discovery Deadlines**, upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

**VIA E-MAIL AND FIRST CLASS MAIL**

Stephanie M. Wimer, Esq.  
Kayla L. Rost, Esq.  
Michael L. Swindler, Esq.  
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Company, L.P. d/b/a Westover Companies*