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Nicholas A. Stobbe

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File #: 140074

September 12, 2022

***VIA ELECTRONIC FILING***

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Genevieve K. Froehlich v. PPL Electric Utilities Corporation**  
**Docket No. F-2022-3034545**

Dear Secretary Chiavetta:

Attached for filing is the Preliminary Objection of PPL Electric Utilities Corporation to the Complaint of Genevieve K. Froehlich in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully,



Nicholas A. Stobbe

NAS/dmc  
Attachments

cc: Certificate of Service

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA EMAIL ONLY**

Genevieve K. Froehlich  
345 Rosewood Lane  
Harrisburg, PA 17111  
[michaelduke@comcast.net](mailto:michaelduke@comcast.net)

Date: September 12, 2022



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Nicholas A. Stobbe

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Genevieve K. Froehlich,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. F-2022-3034545
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

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**NOTICE TO PLEAD**

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YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.101, YOU MAY FILE AN ANSWER TO THE ENCLOSED PRELIMINARY OBJECTION WITHIN TEN (10) DAYS OF THE DATE OF SERVICE HEREOF. YOUR ANSWER TO THE PRELIMINARY OBJECTION MUST BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL FOR PPL ELECTRIC UTILITIES CORPORATION.

Kimberly A. Klock (ID # 89716)  
Michael J. Shafer (ID # 205681)  
PPL Services Corporation  
Two North Ninth Street  
Allentown, PA 18101  
Phone: 610-774-2599  
Fax: 610-774-4102  
E-mail: [kklock@pplweb.com](mailto:kklock@pplweb.com)  
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Date: September 12, 2022

Attorneys for PPL Electric Utilities Corporation

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Genevieve K. Froehlich,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. F-2022-3034545
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

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**PRELIMINARY OBJECTION OF  
PPL ELECTRIC UTILITIES CORPORATION TO THE  
COMPLAINT OF GENEVIEVE K. FROELICH**

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**TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:**

AND NOW, comes PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) and hereby files this Preliminary Objection, pursuant to the regulations of the Pennsylvania Public Utility Commission (“Commission”) at 52 Pa. Code § 5.101, and respectfully requests that the Commission dismiss the above-captioned Formal Complaint (“Complaint”) filed by Genevieve K. Froehlich (“Complainant”) in its entirety because the Commission lacks subject matter jurisdiction due to the Complainant’s active Chapter 13 bankruptcy proceeding at Docket No. 1:18-bk-03800-HWV.

In support thereof, PPL Electric states as follows:

**I. BACKGROUND**

1. PPL Electric is a “public utility” and an “electric distribution company” as those terms are defined under the Public Utility Code, 66 Pa. C.S. §§ 102 and 2803, subject to the regulatory jurisdiction of the Commission.

2. PPL Electric furnishes electric distribution, transmission, and provider of last resort electric supply services to approximately 1.4 million customers throughout its certificated service territory, which includes all or portions of twenty-nine counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania.

3. On August 22, 2022, PPL Electric was served with the above-captioned Formal Complaint filed by the Complainant.

4. In the Complaint, the Complainant requests a payment agreement of “\$200.00 a month including some of the past due bill.” (Complaint ¶ 5, Attachment.)

5. On September 12, 2018, the Complainant filed a petition for Chapter 13 bankruptcy with the U.S. Bankruptcy Court for the Middle District of Pennsylvania at Docket No. 1:18-bk-03800-HWV (“Chapter 13 Petition”).

6. A true and correct copy of the Chapter 13 Petition is attached hereto as **PPL Electric Exhibit A**.

7. The Chapter 13 Petition proceeding remains active as of the filing date of this Answer and New Matter.

8. A true and correct copy of the docket sheet for the Chapter 13 Petition proceeding is attached hereto as **PPL Electric Exhibit B**.

9. PPL Electric herein files this Preliminary Objection to the Complaint. For the reasons explained below, PPL Electric respectfully requests that the Commission summarily dismiss the Complaint because the Commission lacks subject matter jurisdiction due to the Complainant’s active Chapter 13 bankruptcy proceeding.

## **II. STANDARD OF REVIEW**

10. Pursuant to the Commission’s regulations, preliminary objections in response to a pleading may be filed on several grounds, including:

- (1) Lack of Commission jurisdiction or improper service of the pleading initiating the proceeding.
- (2) Failure of a pleading to conform to this chapter or the inclusion of scandalous or impertinent matter.
- (3) Insufficient specificity of a pleading.
- (4) Legal insufficiency of a pleading.
- (5) Lack of capacity to sue, nonjoinder of a necessary party or misjoinder of a cause of action.
- (6) Pendency of a prior proceeding or agreement for alternative dispute resolution.
- (7) Standing of a party to participate in the proceeding.

52 Pa. Code § 5.101(a) (emphasis added).

11. In ruling on preliminary objections, the Presiding Officer must accept as true all well-pled allegations of material facts as well as all inferences reasonably deducible therefrom. *Stilp v. Cmwth.*, 910 A.2d 775, 781 (Pa. Cmwth. 2006) (citing *Dep't of Gen. Servs. v. Bd. of Claims*, 881 A.2d 14 (Pa. Cmwth. 2005)). However, the Presiding Officer need not accept as true conclusions of law, unwarranted inferences from facts, argumentative allegations, or expressions of opinion. *Stanton-Negley Drug Co. v. Dep't of Pub. Welfare*, 927 A.2d 671, 673 (Pa. Cmwth. 2007). Notwithstanding, any doubt must be resolved in favor of the non-moving party. *Stilp*, at 781.

12. In addition, the Presiding Officer must determine whether, based on the factual pleadings, if recovery is possible. *See Rok v. Flaherty*, 527 A.2d 211, 214 (Pa. Cmwth. 1987). Indeed, for preliminary objections to be sustained, it must appear with certainty that the law will permit no recovery. *See Stilp*, at 781; *Milliner v. Enck*, 709 A.2d 417, 418 (Pa. Super. 1998).

### **III. PRELIMINARY OBJECTION**

#### **A. PRELIMINARY OBJECTION NO. 1 – THE COMMISSION LACKS SUBJECT MATTER JURISDICTION OVER THE COMPLAINT BECAUSE THE COMPLAINANT HAS AN ACTIVE CHAPTER 13 BANKRUPTCY PROCEEDING**

13. PPL Electric incorporates by reference Paragraphs 1 through 12 as if fully set forth herein.

14. The Complaint should be dismissed because the Commission lacks subject matter jurisdiction due to the Complainant’s active Chapter 13 bankruptcy proceeding.

15. “[I]t is well established that the Commission lacks jurisdiction to order a payment arrangement for a customer with an active Chapter 13 bankruptcy proceeding.” *Kessler v. PECO Energy Co.*, 2020 Pa. PUC LEXIS 277, at \*10 (Order entered Mar. 18, 2020) (citing *Matronics v. West Penn Power Co.*, Docket No. C-2017-2617235 (Order entered Jan. 9, 2020)).

16. “Generally any bankruptcy petition filed pursuant to the U.S. Bankruptcy Code will operate as a stay and bars either the commencement or continuation of a judicial or administrative proceeding against the debtor where the proceeding was commenced prior to the start of the bankruptcy proceeding or to recover a claim against the debtor that arose before the commencement of the bankruptcy proceeding.” *Steele v. Metro. Edison Co.*, 2020 Pa. PUC LEXIS 444, at \*11 (Order entered Aug. 27, 2020) (citing 11 U.S.C. § 362(a)(1)).

17. However, when there is an active Chapter 13 bankruptcy proceeding, the Commission lacks jurisdiction over both pre- and post-bankruptcy filing arrearages. *Danjou v. West Penn Power Co.*, Docket No. F-2018-3006430, pp. 8-9 (Order entered July 22, 2019) (“*Danjou*”) (citations omitted).

18. As the Commission explained in *Danjou*:

Since the nature of a Chapter 13 bankruptcy is an on-going repayment plan in which all of a debtor’s assets (including

property, income and debts acquired pre-petition and post-petition) are included in the debtor's estate under the exclusive control of the bankruptcy trustee, the Commission is without jurisdiction to issue an order that affects the disposition of the income or assets of a debtor who has an active Chapter 13 bankruptcy proceeding even where the subject of the payment arrangement is a post-petition arrearage.

*Id.* (emphasis added).

19. Here, the Complainant's Chapter 13 bankruptcy proceeding remains active as of the date of this Preliminary Objection. *See PPL Electric Exhibit B.*

20. Further, the Complainant's primary request for relief is that the Commission grant her a new payment agreement that of "\$200.00 a month including some of the past due bill." (Complaint ¶ 5, Attachment.)

21. Therefore, under well-established Commission precedent, the Commission lacks subject matter jurisdiction over the instant Complaint because: (1) she has an active Chapter 13 bankruptcy proceeding; and (2) the Complainant is requesting a payment agreement.

22. Thus, the Commission should dismiss the Complaint pursuant to 52 Pa. Code § 5.101(a)(1) and (a)(4).

**IV. CONCLUSION**

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the above-captioned Formal Complaint filed by Genevieve K. Froehlich be dismissed in its entirety pursuant 52 Pa. Code § 5.101(a)(1) and (a)(4).

Respectfully submitted,



Kimberly A. Klock (ID # 89716)  
Michael J. Shafer (ID # 205681)  
PPL Services Corporation  
Two North Ninth Street  
Allentown, PA 18101  
Phone: 610-774-2599  
Fax: 610-774-4102  
E-mail: [kklock@pplweb.com](mailto:kklock@pplweb.com)  
[mjshafer@pplweb.com](mailto:mjshafer@pplweb.com)

Devin T. Ryan (ID # 316602)  
Nicholas S. Stobbe (ID # 329583)  
Post & Schell, P.C.  
17 North Second Street, 12<sup>th</sup> Floor  
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Fax: 717-731-1985  
E-mail: [dryan@postschell.com](mailto:dryan@postschell.com)  
[nstobbe@postschell.com](mailto:nstobbe@postschell.com)

Date: September 12, 2022

Attorneys for PPL Electric Utilities Corporation

# **PPL Electric Exhibit A**

## **Chapter 13 Bankruptcy Petition**

**Fill in this information to identify your case:**

United States Bankruptcy Court for the:

District Of Pennsylvania Middle

Case number (if known): \_\_\_\_\_ Chapter you are filing under:  
 Chapter 7  
 Chapter 11  
 Chapter 12  
 Chapter 13

Check if this is an amended filing

Official Form 101

**Voluntary Petition for Individuals Filing for Bankruptcy**

12/17

The bankruptcy forms use *you* and *Debtor 1* to refer to a debtor filing alone. A married couple may file a bankruptcy case together—called a *joint case*—and in joint cases, these forms use *you* to ask for information from both debtors. For example, if a form asks, “Do you own a car,” the answer would be yes if either debtor owns a car. When information is needed about the spouses separately, the form uses *Debtor 1* and *Debtor 2* to distinguish between them. In joint cases, one of the spouses must report information as *Debtor 1* and the other as *Debtor 2*. The same person must be *Debtor 1* in all of the forms.

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

**Part 1: Identify Yourself**

	About Debtor 1:	About Debtor 2 (Spouse Only in a Joint Case):
<b>1. Your full name</b>  Write the name that is on your government-issued picture identification (for example, your driver's license or passport).  Bring your picture identification to your meeting with the trustee.	Genevieve First name  K. Middle name  Froehlich Last name  _____ Suffix (Sr., Jr., II, III)	_____ First name  _____ Middle name  _____ Last name  _____ Suffix (Sr., Jr., II, III)
<b>2. All other names you have used in the last 8 years</b>  Include your married or maiden names.	_____ First name  _____ Middle name  _____ Last name  _____ First name  _____ Middle name  _____ Last name	_____ First name  _____ Middle name  _____ Last name  _____ First name  _____ Middle name  _____ Last name
<b>3. Only the last 4 digits of your Social Security number or federal Individual Taxpayer Identification number (ITIN)</b>	XXX - XX - 6 6 1 1 OR 9 XX - XX - _____	XXX - XX - _____ OR 9 XX - XX - _____

About Debtor 1:

About Debtor 2 (Spouse Only in a Joint Case):

4. Any business names and Employer Identification Numbers (EIN) you have used in the last 8 years

Include trade names and doing business as names

[X] I have not used any business names or EINs.

Business name

Business name

EIN

EIN

[ ] I have not used any business names or EINs.

Business name

Business name

EIN

EIN

5. Where you live

345 Rosewood Lane

Number Street

Harrisburg

City

PA

State

17111

ZIP Code

DAUPHIN

County

If your mailing address is different from the one above, fill it in here. Note that the court will send any notices to you at this mailing address.

Number Street

P.O. Box

City

State

ZIP Code

If Debtor 2 lives at a different address:

Number Street

City

State

ZIP Code

County

If Debtor 2's mailing address is different from yours, fill it in here. Note that the court will send any notices to this mailing address.

Number Street

P.O. Box

City

State

ZIP Code

6. Why you are choosing this district to file for bankruptcy

Check one:

[X] Over the last 180 days before filing this petition, I have lived in this district longer than in any other district.

[ ] I have another reason. Explain. (See 28 U.S.C. § 1408.)

Check one:

[ ] Over the last 180 days before filing this petition, I have lived in this district longer than in any other district.

[ ] I have another reason. Explain. (See 28 U.S.C. § 1408.)

Part 2: Tell the Court About Your Bankruptcy Case

7. The chapter of the Bankruptcy Code you are choosing to file under

Check one. (For a brief description of each, see Notice Required by 11 U.S.C. § 342(b) for Individuals Filing for Bankruptcy (Form 2010)). Also, go to the top of page 1 and check the appropriate box.

- Chapter 7
Chapter 11
Chapter 12
Chapter 13

8. How you will pay the fee

- I will pay the entire fee when I file my petition. Please check with the clerk's office in your local court for more details about how you may pay. Typically, if you are paying the fee yourself, you may pay with cash, cashier's check, or money order. If your attorney is submitting your payment on your behalf, your attorney may pay with a credit card or check with a pre-printed address.
I need to pay the fee in installments. If you choose this option, sign and attach the Application for Individuals to Pay The Filing Fee in Installments (Official Form 103A).
I request that my fee be waived (You may request this option only if you are filing for Chapter 7. By law, a judge may, but is not required to, waive your fee, and may do so only if your income is less than 150% of the official poverty line that applies to your family size and you are unable to pay the fee in installments). If you choose this option, you must fill out the Application to Have the Chapter 7 Filing Fee Waived (Official Form 103B) and file it with your petition.

9. Have you filed for bankruptcy within the last 8 years?

- No
Yes. District When Case number
MM / DD / YYYY
District When Case number
MM / DD / YYYY
District When Case number
MM / DD / YYYY

10. Are any bankruptcy cases pending or being filed by a spouse who is not filing this case with you, or by a business partner, or by an affiliate?

- No
Yes. Debtor Relationship to you
District When Case number, if known
MM / DD / YYYY
Debtor Relationship to you
District When Case number, if known
MM / DD / YYYY

11. Do you rent your residence?

- No. Go to line 12.
Yes. Has your landlord obtained an eviction judgment against you?
No. Go to line 12.
Yes. Fill out Initial Statement About an Eviction Judgment Against You (Form 101A) and file it as part of this bankruptcy petition.

**Part 3: Report About Any Businesses You Own as a Sole Proprietor**

**12. Are you a sole proprietor of any full- or part-time business?**

- No. Go to Part 4.
- Yes. Name and location of business

A sole proprietorship is a business you operate as an individual, and is not a separate legal entity such as a corporation, partnership, or LLC.

If you have more than one sole proprietorship, use a separate sheet and attach it to this petition.

\_\_\_\_\_  
Name of business, if any

\_\_\_\_\_  
Number Street

\_\_\_\_\_

\_\_\_\_\_  
City State ZIP Code

Check the appropriate box to describe your business:

- Health Care Business (as defined in 11 U.S.C. § 101(27A))
- Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
- Stockbroker (as defined in 11 U.S.C. § 101(53A))
- Commodity Broker (as defined in 11 U.S.C. § 101(6))
- None of the above

**13. Are you filing under Chapter 11 of the Bankruptcy Code and are you a small business debtor?**

For a definition of *small business debtor*, see 11 U.S.C. § 101(51D).

*If you are filing under Chapter 11, the court must know whether you are a small business debtor so that it can set appropriate deadlines. If you indicate that you are a small business debtor, you must attach your most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).*

- No. I am not filing under Chapter 11.
- No. I am filing under Chapter 11, but I am NOT a small business debtor according to the definition in the Bankruptcy Code.
- Yes. I am filing under Chapter 11 and I am a small business debtor according to the definition in the Bankruptcy Code.

**Part 4: Report if You Own or Have Any Hazardous Property or Any Property That Needs Immediate Attention**

**14. Do you own or have any property that poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety? Or do you own any property that needs immediate attention?**

*For example, do you own perishable goods, or livestock that must be fed, or a building that needs urgent repairs?*

- No
- Yes. What is the hazard? \_\_\_\_\_

If immediate attention is needed, why is it needed? \_\_\_\_\_

Where is the property? \_\_\_\_\_  
Number Street

\_\_\_\_\_  
City State ZIP Code

Part 5: Explain Your Efforts to Receive a Briefing About Credit Counseling

15. Tell the court whether you have received a briefing about credit counseling.

The law requires that you receive a briefing about credit counseling before you file for bankruptcy. You must truthfully check one of the following choices. If you cannot do so, you are not eligible to file.

If you file anyway, the court can dismiss your case, you will lose whatever filing fee you paid, and your creditors can begin collection activities again.

About Debtor 1:

You must check one:

[X] I received a briefing from an approved credit counseling agency within the 180 days before I filed this bankruptcy petition, and I received a certificate of completion.

Attach a copy of the certificate and the payment plan, if any, that you developed with the agency.

[ ] I received a briefing from an approved credit counseling agency within the 180 days before I filed this bankruptcy petition, but I do not have a certificate of completion.

Within 14 days after you file this bankruptcy petition, you MUST file a copy of the certificate and payment plan, if any.

[ ] I certify that I asked for credit counseling services from an approved agency, but was unable to obtain those services during the 7 days after I made my request, and exigent circumstances merit a 30-day temporary waiver of the requirement.

To ask for a 30-day temporary waiver of the requirement, attach a separate sheet explaining what efforts you made to obtain the briefing, why you were unable to obtain it before you filed for bankruptcy, and what exigent circumstances required you to file this case.

Your case may be dismissed if the court is dissatisfied with your reasons for not receiving a briefing before you filed for bankruptcy.

If the court is satisfied with your reasons, you must still receive a briefing within 30 days after you file. You must file a certificate from the approved agency, along with a copy of the payment plan you developed, if any. If you do not do so, your case may be dismissed.

Any extension of the 30-day deadline is granted only for cause and is limited to a maximum of 15 days.

[ ] I am not required to receive a briefing about credit counseling because of:

[ ] Incapacity. I have a mental illness or a mental deficiency that makes me incapable of realizing or making rational decisions about finances.

[ ] Disability. My physical disability causes me to be unable to participate in a briefing in person, by phone, or through the internet, even after I reasonably tried to do so.

[ ] Active duty. I am currently on active military duty in a military combat zone.

If you believe you are not required to receive a briefing about credit counseling, you must file a motion for waiver of credit counseling with the court.

About Debtor 2 (Spouse Only in a Joint Case):

You must check one:

[ ] I received a briefing from an approved credit counseling agency within the 180 days before I filed this bankruptcy petition, and I received a certificate of completion.

Attach a copy of the certificate and the payment plan, if any, that you developed with the agency.

[ ] I received a briefing from an approved credit counseling agency within the 180 days before I filed this bankruptcy petition, but I do not have a certificate of completion.

Within 14 days after you file this bankruptcy petition, you MUST file a copy of the certificate and payment plan, if any.

[ ] I certify that I asked for credit counseling services from an approved agency, but was unable to obtain those services during the 7 days after I made my request, and exigent circumstances merit a 30-day temporary waiver of the requirement.

To ask for a 30-day temporary waiver of the requirement, attach a separate sheet explaining what efforts you made to obtain the briefing, why you were unable to obtain it before you filed for bankruptcy, and what exigent circumstances required you to file this case.

Your case may be dismissed if the court is dissatisfied with your reasons for not receiving a briefing before you filed for bankruptcy.

If the court is satisfied with your reasons, you must still receive a briefing within 30 days after you file. You must file a certificate from the approved agency, along with a copy of the payment plan you developed, if any. If you do not do so, your case may be dismissed.

Any extension of the 30-day deadline is granted only for cause and is limited to a maximum of 15 days.

[ ] I am not required to receive a briefing about credit counseling because of:

[ ] Incapacity. I have a mental illness or a mental deficiency that makes me incapable of realizing or making rational decisions about finances.

[ ] Disability. My physical disability causes me to be unable to participate in a briefing in person, by phone, or through the internet, even after I reasonably tried to do so.

[ ] Active duty. I am currently on active military duty in a military combat zone.

If you believe you are not required to receive a briefing about credit counseling, you must file a motion for waiver of credit counseling with the court.

**Part 6: Answer These Questions for Reporting Purposes**

16. What kind of debts do you have?

16a. Are your debts primarily consumer debts? Consumer debts are defined in 11 U.S.C. § 101(8) as "incurred by an individual primarily for a personal, family, or household purpose."

- No. Go to line 16b.
- Yes. Go to line 17.

16b. Are your debts primarily business debts? Business debts are debts that you incurred to obtain money for a business or investment or through the operation of the business or investment.

- No. Go to line 16c.
- Yes. Go to line 17.

16c. State the type of debts you owe that are not consumer debts or business debts.

17. Are you filing under Chapter 7?

No. I am not filing under Chapter 7. Go to line 18.

Do you estimate that after any exempt property is excluded and administrative expenses are paid that funds will be available for distribution to unsecured creditors?

- Yes. I am filing under Chapter 7. Do you estimate that after any exempt property is excluded and administrative expenses are paid that funds will be available to distribute to unsecured creditors?
  - No
  - Yes

18. How many creditors do you estimate that you owe?

- 1-49
- 50-99
- 100-199
- 200-999
- 1,000-5,000
- 5,001-10,000
- 10,001-25,000
- 25,001-50,000
- 50,001-100,000
- More than 100,000

19. How much do you estimate your assets to be worth?

- \$0-\$50,000
- \$50,001-\$100,000
- \$100,001-\$500,000
- \$500,001-\$1 million
- \$1,000,001-\$10 million
- \$10,000,001-\$50 million
- \$50,000,001-\$100 million
- \$100,000,001-\$500 million
- \$500,000,001-\$1 billion
- \$1,000,000,001-\$10 billion
- \$10,000,000,001-\$50 billion
- More than \$50 billion

20. How much do you estimate your liabilities to be?

- \$0-\$50,000
- \$50,001-\$100,000
- \$100,001-\$500,000
- \$500,001-\$1 million
- \$1,000,001-\$10 million
- \$10,000,001-\$50 million
- \$50,000,001-\$100 million
- \$100,000,001-\$500 million
- \$500,000,001-\$1 billion
- \$1,000,000,001-\$10 billion
- \$10,000,000,001-\$50 billion
- More than \$50 billion

**Part 7: Sign Below**

For you

I have examined this petition, and I declare under penalty of perjury that the information provided is true and correct.

If I have chosen to file under Chapter 7, I am aware that I may proceed, if eligible, under Chapter 7, 11, 12, or 13 of title 11, United States Code. I understand the relief available under each chapter, and I choose to proceed under Chapter 7.

If no attorney represents me and I did not pay or agree to pay someone who is not an attorney to help me fill out this document, I have obtained and read the notice required by 11 U.S.C. § 342(b).

I request relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I understand making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$250,000, or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

**X** s/Genevieve K. Froehlich

Signature of Debtor 1

Executed on 08/15/2018  
MM / DD / YYYY

**X** \_\_\_\_\_

Signature of Debtor 2

Executed on \_\_\_\_\_  
MM / DD / YYYY

Debtor 1

Genevieve K. Froehlich

First Name

Middle Name

Last Name

Case number (if known)

**For your attorney, if you are represented by one**

**If you are not represented by an attorney, you do not need to file this page.**

I, the attorney for the debtor(s) named in this petition, declare that I have informed the debtor(s) about eligibility to proceed under Chapter 7, 11, 12, or 13 of title 11, United States Code, and have explained the relief available under each chapter for which the person is eligible. I also certify that I have delivered to the debtor(s) the notice required by 11 U.S.C. § 342(b) and, in a case in which § 707(b)(4)(D) applies, certify that I have no knowledge after an inquiry that the information in the schedules filed with the petition is incorrect.

X

s/John M. Hyams

Date 08/15/2018

Signature of Attorney for Debtor

MM / DD / YYYY

John M. Hyams

Printed name

Law Offices Of John M. Hyams

Firm name

2023 North 2nd Street

Number Street

Harrisburg

City

PA

State

17102

ZIP Code

Contact phone (717) 520-0300

Email address jmh@johnhyamslaw.com

87327

Bar number

PA

State

# **PPL Electric Exhibit B**

## **Chapter 13 Bankruptcy Proceeding's Docket Sheet**

**U.S. Bankruptcy Court  
Middle District of Pennsylvania (Harrisburg)  
Bankruptcy Petition #: 1:18-bk-03800-HWV**

Case Administrators

Assigned to: Chief Judge Henry W. Van Eck  
Chapter 13  
Voluntary  
Asset

Date filed: 09/12/2018  
Plan confirmed: 03/01/2019  
341 meeting: 10/18/2018  
Deadline for filing claims: 11/21/2018  
Deadline for filing claims (govt.): 03/11/2019

**Debtor 1**

**Genevieve K. Froehlich**  
345 Rosewood Lane  
Harrisburg, PA 17111  
DAUPHIN-PA  
717-418-4838  
SSN / ITIN: xxx-xx-6611

represented by **John Matthew Hyams**

Law Offices of John M. Hyams  
2023 N 2nd St  
Harrisburg, PA 17102  
717-520-0300  
Fax : 717-298-2055  
Email: [jmh@johnhyamslaw.com](mailto:jmh@johnhyamslaw.com)

**Trustee**

**Jack N Zaharopoulos (Trustee)**  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
717-566-6097

**Former Trustee**

**Charles J DeHart, III (Trustee)**  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
717 566-6097  
TERMINATED: 04/30/2021

**Asst. U.S. Trustee**

**United States Trustee**  
228 Walnut Street, Suite 1190  
Harrisburg, PA 17101  
717 221-4515

Filing Date	#	Docket Text
09/12/2018	<a href="#">1</a> (7 pgs)	Chapter 13 Voluntary Petition for an Individual . Filing fee due in the amount of \$ 310.00 Filed by John Matthew Hyams of Law Offices of John M. Hyams on behalf of Genevieve K. Froehlich. (Hyams, John) (Entered: 09/12/2018)
09/12/2018	2	Creditor List Uploaded. (There is no image or paper document associated with this entry.) Filed by John Matthew Hyams of Law Offices of John

		M. Hyams on behalf of Genevieve K. Froehlich (RE: related document(s) <a href="#">1</a> ). (Hyams, John) (Entered: 09/12/2018)
09/12/2018	<a href="#">3</a> (1 pg)	Certificate of Credit Counseling for Debtor 1 Filed by John Matthew Hyams of Law Offices of John M. Hyams on behalf of Genevieve K. Froehlich (RE: related document(s) <a href="#">1</a> ). (Hyams, John) (Entered: 09/12/2018)
09/12/2018		Receipt of Voluntary Petition (Chapter 13)(1:18-bk-03800) [misc,volp13a] ( 310.00) filing fee. Receipt number 8951660, amount \$ 310.00. (RE: related document(s) <a href="#">1</a> ). (U.S. Treasury) (Entered: 09/12/2018)
09/12/2018	4	Statement About Your Social Security Numbers (Document is restricted.) Filed by John Matthew Hyams of Law Offices of John M. Hyams on behalf of Genevieve K. Froehlich (RE: related document(s) <a href="#">1</a> ). (Hyams, John) (Entered: 09/12/2018)
09/12/2018	5	Meeting of Creditors and Appointment of Trustee Charles J DeHart, III (Trustee), with 341(a) meeting to be held on 10/18/2018 at 10:00 AM at Federal Bldg, Trustee Hearing Rm, Rm 1160, 11th Fl, 228 Walnut St, Harrisburg, PA 17101. Proofs of Claim due by 11/21/2018. Government Proofs of Claim due by 03/11/2019. Objections to Dischargeability due by 12/17/2018. (Docketer, Automatic) (Entered: 09/12/2018)
09/13/2018	<a href="#">6</a> (2 pgs; 2 docs)	Notice of Incomplete and/or Deficient Filing. Request submitted to BNC for mailing. (RE: related document(s) <a href="#">1</a> ). (McHugh, Michael) (Entered: 09/13/2018)
09/13/2018	<a href="#">7</a> (3 pgs; 2 docs)	Notice of Meeting of Creditors and Appointment of Trustee. Request submitted to BNC for mailing (RE: related document(s) <a href="#">1</a> , <a href="#">5</a> ). (McHugh, Michael) (Entered: 09/13/2018)
09/15/2018	<a href="#">8</a> (3 pgs)	BNC Certificate of Notice (341 Meeting Notice (Chapter 13)) (RE: related document(s) <a href="#">7</a> ). Notice Date 09/15/2018. (Admin.) (Entered: 09/16/2018)
09/25/2018	<a href="#">9</a> (11 pgs)	Chapter 13 Plan (Includes no Motion(s) to Avoid Liens and no Motion(s) to Value Collateral) Filed by John Matthew Hyams of Law Offices of John M. Hyams on behalf of Genevieve K. Froehlich (RE: related document(s) <a href="#">1</a> ). (Hyams, John) (Entered: 09/25/2018)
09/25/2018	<a href="#">10</a> (180 pgs; 3 docs)	Notice Required by 11 U.S.C. s342(b) for Individuals Filing for Bankruptcy , Schedule A-B; Schedule C; Schedule D; Schedule E-F; Schedule G; Schedule H; Schedule I; Schedule J; A Summary of Your Assets and Liabilities and Certain Statistical Information; Declaration About an Individual Debtors Schedules;, Statement of Financial Affairs for Individuals Filing for Bankruptcy, Chapter 13 Calculation of Your Disposable Income ., Chapter 13 Statement of Your Current Monthly Income and Calculation of Commitment Period for 3 Years. Disposable Income Is <i>Not</i> Determined. , Declaration About an Individual Debtor's Schedules , Disclosure of Compensation of Attorney for Debtor Filed by John Matthew Hyams of Law Offices of John M. Hyams on behalf of Genevieve K. Froehlich (RE: related document(s) <a href="#">1</a> ). (Attachments: # <a href="#">1</a> Main Document # <a href="#">2</a> Main Document) (Hyams, John) <i>Text modified per image</i> . Modified on 9/26/2018 (McHugh, Michael). (Entered: 09/25/2018)

09/25/2018	<a href="#">11</a> (7 pgs)	Employee Income Records Filed by John Matthew Hyams of Law Offices of John M. Hyams on behalf of Genevieve K. Froehlich. (Hyams, John) (Entered: 09/25/2018)
10/12/2018	<a href="#">12</a> (1 pg)	Request for Notice under 2002 Filed by Mario John Hanyon of Phelan Hallinan & Schmieg on behalf of Wells Fargo. (Hanyon, Mario) (Entered: 10/12/2018)
10/22/2018	13	Certification that 341 Meeting of Creditors Held. Clerk to provide notice of confirmation hearing to all parties in interest. (There is no image or paper document associated with this entry.). Confirmation hearing to be held on 12/5/2018 at 10:00 AM at 3rd & Walnut Sts, Bankruptcy Courtroom (3rd Fl), Ronald Reagan Federal Building, Harrisburg, PA17101. Last day to Object to Plan Confirmation 11/28/2018. (dehart, III(jd), Charles) (Entered: 10/22/2018)
10/22/2018	<a href="#">14</a> (14 pgs; 4 docs)	Notice of Confirmation Hearing. Request submitted to BNC for mailing. (McHugh, Michael) (Entered: 10/22/2018)
10/24/2018	<a href="#">15</a> (2 pgs)	BNC Certificate of Notice (Notice setting Confirmation Hearing) (RE: related document(s) <a href="#">14</a> ). Notice Date 10/24/2018. (Admin.) (Entered: 10/25/2018)
10/24/2018	<a href="#">16</a> (12 pgs)	BNC Certificate of Notice (Chapter 12/13 Plan) (RE: related document(s) <a href="#">14</a> ). Notice Date 10/24/2018. (Admin.) (Entered: 10/25/2018)
10/26/2018	<a href="#">17</a> (2 pgs)	Objection to Ch. 13 Plan Filed by Trustee (RE: related document(s) <a href="#">9</a> ). (dehart, III(db), Charles) (Entered: 10/26/2018)
11/26/2018	<a href="#">18</a> (12 pgs; 2 docs)	First Amended Chapter 13 Plan (Includes no Motion(s) to Avoid Liens and no Motion(s) to Value Collateral) with Certificate of Service and Notice of Self Scheduled Hearing with Objection Deadline. Notice served on 11/27/2018. Filed by John Matthew Hyams of Law Offices of John M. Hyams on behalf of Genevieve K. Froehlich (RE: related document(s) <a href="#">9</a> ). Hearing scheduled for 01/16/2019 at 10:00 AM - Federal Building, 228 Walnut St., Harrisburg, PA. Last day to Object to Plan Confirmation 1/9/2019. (Attachments: # <a href="#">1</a> Notice)(Hyams, John) (Entered: 11/26/2018)
11/27/2018	19	Proceeding Memo Confirmation Hearing canceled. No record made. <i>The confirmation hearing scheduled for 12/5/18 is cancelled, a first amended plan was filed.</i> (There is no image or paper document associated with this entry.) (RE: related document(s) <a href="#">9</a> , <a href="#">17</a> ). (George, Deborah) (Entered: 11/27/2018)
11/27/2018	<a href="#">20</a> (3 pgs)	Certificate of Service Filed by John Matthew Hyams of Law Offices of John M. Hyams on behalf of Genevieve K. Froehlich (RE: related document(s) <a href="#">18</a> ). (Hyams, John) (Entered: 11/27/2018)
01/11/2019	21	I, John M. Hyams, attorney for debtor(s), hereby certify that on 8/20/2018, Debtor(s) and I executed a Rights and Responsibilities Agreement (L.B.F. 2016-2(a)) in connection with legal services to be rendered in the within case. I further certify that a copy of the fully executed copy is retained in my file. (There is no image or paper document associated with this entry.) Filed by John Matthew Hyams of

		Law Offices of John M. Hyams on behalf of Genevieve K. Froehlich. (Hyams, John) (Entered: 01/11/2019)
01/11/2019	<a href="#">22</a> (1 pg)	Request for Payment of Ch. 13 Compensation and Expenses (LBF 2016-2(c)) Filed by John Matthew Hyams of Law Offices of John M. Hyams on behalf of Genevieve K. Froehlich. (Hyams, John) (Entered: 01/11/2019)
01/14/2019	<a href="#">23</a> (1 pg)	Pre-Confirmation Certification of Compliance with Post Petition Domestic Support Obligations (LBF 3015-3(a)) Filed by John Matthew Hyams of Law Offices of John M. Hyams on behalf of Genevieve K. Froehlich. (Hyams, John) (Entered: 01/14/2019)
01/16/2019	24	Proceeding Memo Confirmation Hearing held, record made. Matter taken under advisement in accordance with the timeline set forth in Misc. Order 19-2 (There is no image or paper document associated with this entry.) . (Irving, Beth) (Entered: 01/16/2019)
02/13/2019	25	Order Reassigning Case to Judge Henry W. Van Eck in the furtherance of judicial administration. /s/Robert N. Opel, II (There is no image or paper document associated with this entry.) (Stefano, Carol) (Entered: 02/14/2019)
02/21/2019	<a href="#">26</a> (34 pgs; 9 docs)	Motion for Relief from Automatic Stay with nonconcurrence and Notice of Self Scheduled Hearing with Objection Deadline. Re: RE: Property Address: 345 Rosewood Lane, Harrisburg, PA 17111. Filing fee due in the amount of \$181.00. Notice served on 2/21/2019. Filed by Jerome B Blank of Phelan Hallinan & Schmieg LLP on behalf of Loancare, LLC. Objections due by 3/7/2019. Hearing scheduled for 03/12/2019 at 09:30 AM - Federal Building, 228 Walnut St., Harrisburg, PA. (Attachments: # <a href="#">1</a> Proposed Order # <a href="#">2</a> Certificate of Non-Concurrence # <a href="#">3</a> Post Petition Payment History # <a href="#">4</a> Exhibit A, Note # <a href="#">5</a> Exhibit B, Mortgage # <a href="#">6</a> Exhibit C, Assignment of Mortgage # <a href="#">7</a> Notice of Hearing # <a href="#">8</a> Certificate of Service) (Blank, Jerome) (Entered: 02/21/2019)
02/22/2019		Receipt of Motion for Relief from Automatic Stay(1:18-bk-03800-HWV) [motion,mrlfsty] ( 181.00) filing fee. Receipt number 9145531, amount \$ 181.00. (RE: related document(s) <a href="#">26</a> ). (U.S. Treasury) (Entered: 02/22/2019)
03/01/2019	<a href="#">27</a> (2 pgs; 2 docs)	Order Confirming Amended Chapter 13 Plan filed 11/26/2018 (RE: related document(s) 13 , <a href="#">18</a> ). (McHugh, Michael) (Entered: 03/01/2019)
03/05/2019	<a href="#">28</a> (4 pgs; 3 docs)	Answer Filed by John Matthew Hyams of Law Offices of John M. Hyams on behalf of Genevieve K. Froehlich (RE: related document(s) <a href="#">26</a> ). (Attachments: # <a href="#">1</a> Proposed Order # <a href="#">2</a> Certificate of Service) (Hyams, John) (Entered: 03/05/2019)
03/12/2019	29	Proceeding Memo re: Hearing on Motion for Relief from Automatic Stay; held. Record made. Matter continued. Order - stay continued pending the conclusion of the continued hearing. Appearances: Thomas Song. IT IS SO ORDERED on 3/12/2019. /s/Henry W. Van Eck (There is no image or paper document associated with this entry.) (RE: related document(s) <a href="#">26</a> , <a href="#">28</a> ). Hearing scheduled for 4/9/2019 at 09:30 AM at 3rd & Walnut Sts, Bankruptcy Courtroom (3rd Fl), Ronald Reagan Federal Building, Harrisburg, PA 17101. (Goodling, Joan) (Entered: 03/12/2019)

03/30/2019	<a href="#">30</a> (4 pgs; 3 docs)	Transfer of Claim. Transfer Agreement 3001 (e) 2 Transferor: WELLS FARGO (Claim No. 2) To Specialized Loan Servicing LLC. Filing fee due in the amount of \$ 25.00 for each transfer of claim. Notice sent to Parties. Filed by Specialized Loan Servicing LLC (Lea, Natalie) (Entered: 03/30/2019)
03/30/2019		Receipt of Transfer of Claim(1:18-bk-03800-HWV) [claims,tclm] ( 25.00) filing fee. Receipt number 9193420, amount \$ 25.00. (RE: related document(s) <a href="#">30</a> ). (U.S. Treasury) (Entered: 03/30/2019)
04/03/2019	<a href="#">31</a> (2 pgs)	BNC Certificate of Notice (Notice regarding Transfer of Claim) (RE: related document(s) <a href="#">30</a> ). Notice Date 04/03/2019. (Admin.) (Entered: 04/04/2019)
04/08/2019	<a href="#">32</a> (5 pgs; 4 docs)	Motion to Continue Filed by Thomas Song of Phelan Hallinan Diamond & Jones on behalf of Loancare, LLC (RE: related document(s) 29 ). (Attachments: # <a href="#">1</a> Proposed Order # <a href="#">2</a> Certificate of Concurrence # <a href="#">3</a> Certificate of Service) (Song, Thomas) (Entered: 04/08/2019)
04/08/2019	<a href="#">33</a> (2 pgs; 2 docs)	Order Granting Motion To Continue (RE: related document(s) <a href="#">26</a> , <a href="#">32</a> ). Hearing scheduled for 5/7/2019 at 09:30 AM at 3rd & Walnut Sts, Bankruptcy Courtroom (3rd Fl), Ronald Reagan Federal Building, Harrisburg, PA17101. (McHugh, Michael) (Entered: 04/08/2019)
05/07/2019	34	Proceeding Memo re: Hearing on Motion for Relief from Automatic Stay (re: 345 Rosewood Lane, Harrisburg, PA 17111); held. Record made. Matter continued. Order - stay continued pending the conclusion of the continued hearing. Appearances: Thomas Song. IT IS SO ORDERED on 5/7/2019. /s/Henry W. Van Eck (There is no image or paper document associated with this entry.) (RE: related document(s) <a href="#">26</a> , <a href="#">28</a> ). Hearing scheduled for 6/11/2019 at 09:30 AM at 3rd & Walnut Sts, Bankruptcy Courtroom (3rd Fl), Ronald Reagan Federal Building, Harrisburg, PA17101. (Goodling, Joan) (Entered: 05/07/2019)
06/03/2019	<a href="#">35</a> (3 pgs; 2 docs)	Stipulation <i>In Settlement of the Motion for Relief From the Automatic Stay</i> Filed by Thomas Song of Phelan Hallinan Diamond & Jones on behalf of Loancare, LLC (RE: related document(s) <a href="#">26</a> ). (Attachments: # <a href="#">1</a> Proposed Order) (Song, Thomas) (Entered: 06/03/2019)
06/04/2019	<a href="#">36</a> (2 pgs; 2 docs)	Order Approving Stipulation (RE: related document(s) <a href="#">35</a> ). (McHugh, Michael) (Entered: 06/04/2019)
06/04/2019	37	Hearing on 6/11/2019 canceled. Motion resolved by stipulation. (There is no image or paper document associated with this entry.) (RE: related document(s) 34 ). (Goodling, Joan) (Entered: 06/04/2019)
06/11/2019	<a href="#">38</a> (16 pgs; 4 docs)	Motion to Modify Confirmed Plan and LBF 3015-2(b). Amended/Modified Plan (Post Confirmation) (Includes no Motion(s) to Avoid Liens and no Motion(s) to Value Collateral). Filed by John Matthew Hyams of Law Offices of John M. Hyams on behalf of Genevieve K. Froehlich (RE: related document(s) <a href="#">18</a> , <a href="#">27</a> ). (Attachments: # <a href="#">1</a> Proposed Order # <a href="#">2</a> Certificate of Service # <a href="#">3</a> Exhibit) (Hyams, John) (Entered: 06/11/2019)
07/01/2019	<a href="#">39</a> (2 pgs)	Objection to Ch. 13 Plan Filed by Trustee (RE: related document(s) <a href="#">38</a> ). (dehart, III(db), Charles) (Entered: 07/01/2019)

07/03/2019	<a href="#">40</a> (2 pgs; 2 docs)	Notice setting hearing. Request submitted to BNC for mailing. (RE: related document(s) <a href="#">38</a> ). Hearing scheduled for 8/14/2019 at 09:30 AM at 3rd & Walnut Sts, Bankruptcy Courtroom (3rd Fl), Ronald Reagan Federal Building, Harrisburg, PA17101. (McHugh, Michael) (Entered: 07/03/2019)
08/07/2019	<a href="#">41</a> (16 pgs; 4 docs)	Amended Motion to Modify Confirmed Plan and LBF 3015-2(b). Amended/Modified Plan (Post Confirmation) (Includes no Motion(s) to Avoid Liens and no Motion(s) to Value Collateral). Filed by John Matthew Hyams of Law Offices of John M. Hyams on behalf of Genevieve K. Froehlich (RE: related document(s) <a href="#">27</a> , <a href="#">38</a> ). (Attachments: # <a href="#">1</a> Proposed Order # <a href="#">2</a> Certificate of Service # <a href="#">3</a> Exhibit) (Hyams, John) (Entered: 08/07/2019)
08/08/2019	42	Hearing on 8/14/2019 canceled. Mooted by Amended Motion to Modify filed. (There is no image or paper document associated with this entry.) (RE: related document(s) <a href="#">40</a> ). (Goodling, Joan) (Entered: 08/08/2019)
08/28/2019	<a href="#">43</a> (2 pgs)	Objection to Ch. 13 Plan Filed by Trustee (RE: related document(s) <a href="#">41</a> ). (DeHart, III (Trustee), Charles) (Entered: 08/28/2019)
08/29/2019	<a href="#">44</a> (2 pgs; 2 docs)	Notice setting hearing. Request submitted to BNC for mailing. (RE: related document(s) <a href="#">41</a> ). Hearing scheduled for 9/25/2019 at 09:30 AM at 3rd & Walnut Sts, Bankruptcy Courtroom (3rd Fl), Ronald Reagan Federal Building, Harrisburg, PA17101. (McHugh, Michael) (Entered: 08/29/2019)
09/25/2019	45	Proceeding Memo re: Hearing on Amended Motion to Modify Plan; held. Motion(s) withdrawn in Open Court. Appearances: John Hyams and James Jones. Non-Appearances: N/A. (There is no image or paper document associated with this entry.) (RE: related document(s) <a href="#">41</a> , <a href="#">43</a> ). (Goodling, Joan) (Entered: 09/25/2019)
10/23/2019	<a href="#">46</a> (9 pgs; 5 docs)	Certificate of Default Filed by Thomas Song of Phelan Hallinan Diamond & Jones on behalf of Specialized Loan Servicing LLC (RE: related document(s) <a href="#">36</a> ). (Attachments: # <a href="#">1</a> Exhibit Default Letter # <a href="#">2</a> Exhibit Stipulation # <a href="#">3</a> Proposed Order # <a href="#">4</a> Certificate of Service) (Song, Thomas) (Entered: 10/23/2019)
10/24/2019	<a href="#">47</a> (2 pgs; 2 docs)	Answer Filed by John Matthew Hyams of Law Offices of John M. Hyams on behalf of Genevieve K. Froehlich (RE: related document(s) <a href="#">46</a> ). (Attachments: # <a href="#">1</a> Proposed Order) (Hyams, John) (Entered: 10/24/2019)
10/25/2019	<a href="#">48</a> (2 pgs; 2 docs)	Notice setting hearing. Request submitted to BNC for mailing. (RE: related document(s) <a href="#">46</a> ). Hearing scheduled for 11/19/2019 at 09:30 AM at 3rd & Walnut Sts, Bankruptcy Courtroom (3rd Fl), Ronald Reagan Federal Building, Harrisburg, PA17101. (McHugh, Michael) (Entered: 10/25/2019)
11/19/2019	49	<b>Proceeding Memo for hearing scheduled on: 11/19/2019</b> <b>Matter:</b> CERTIFICATE OF DEFAULT FILED ON STIPULATION (#35); ANSWER (#47). <b>Appearances:</b> John Matthew Hyams, Thomas Song on behalf of Specialized Loan Servicing. <b>Disposition:</b> Hearing held. Certificate of Default of Specialized Loan Servicing was withdrawn on the record with consent. Record made. (There is no image or paper document associated

		with this entry.) (vCal Hearing ID (453218)). (RE: related document(s) <a href="#">46</a> ). (George, Deborah) (Entered: 11/19/2019)
12/18/2019	<a href="#">50</a> (16 pgs; 4 docs)	Amended Motion to Modify Confirmed Plan and LBF 3015-2(b). Amended/Modified Plan (Post Confirmation) (Includes no Motion(s) to Avoid Liens and no Motion(s) to Value Collateral). Filed by John Matthew Hyams of Law Offices of John M. Hyams on behalf of Genevieve K. Froehlich (RE: related document(s) <a href="#">27</a> , <a href="#">41</a> ). (Attachments: # <a href="#">1</a> Proposed Order # <a href="#">2</a> Certificate of Service # <a href="#">3</a> Exhibit) (Hyams, John) (Entered: 12/18/2019)
01/09/2020	<a href="#">51</a> (2 pgs; 2 docs)	Order Granting Amended Motion To Modify Plan. (RE: related document(s) <a href="#">50</a> ). (McHugh, Michael) (Entered: 01/09/2020)
01/30/2020	<a href="#">52</a> (4 pgs; 3 docs)	Transfer of Claim. Transfer Agreement 3001 (e) 2 Transferor: Specialized Loan Servicing LLC (Claim No. 2) To Specialized Loan Servicing LLC. Filing fee due in the amount of \$ 25.00 for each transfer of claim. Notice sent to Parties. Filed by Specialized Loan Servicing LLC (Rafferty, John) (Entered: 01/30/2020)
01/30/2020		Receipt of Transfer of Claim( <a href="#">1:18-bk-03800-HWV</a> ) [claims,trclm] ( 25.00) filing fee. Receipt number A9565949, amount \$ 25.00. (RE: related document(s) <a href="#">52</a> ). (U.S. Treasury) (Entered: 01/30/2020)
02/02/2020	<a href="#">53</a> (2 pgs)	BNC Certificate of Notice (Notice regarding Transfer of Claim) (RE: related document(s) <a href="#">52</a> ). Notice Date 02/02/2020. (Admin.) (Entered: 02/03/2020)
02/26/2020	<a href="#">54</a> (1 pg)	Entry of Appearance of James C. Warmbrodt Filed by James Warmbrodt on behalf of InSolve Global Credit Fund III, L.P. for the benefit of Lodge Series IV Trust. (Warmbrodt, James) (Entered: 02/26/2020)
02/28/2020	<a href="#">55</a> (4 pgs; 3 docs)	Transfer of Claim. Transfer Agreement 3001 (e) 2 Transferor: Specialized Loan Servicing LLC (Claim No. 2) To Specialized Loan Servicing LLC. Filing fee due in the amount of \$ 25.00 for each transfer of claim. Notice sent to Parties. Filed by Specialized Loan Servicing LLC (Rafferty, John) (Entered: 02/28/2020)
02/28/2020		Receipt of Transfer of Claim( <a href="#">1:18-bk-03800-HWV</a> ) [claims,trclm] ( 25.00) filing fee. Receipt number A9602846, amount \$ 25.00. (RE: related document(s) <a href="#">55</a> ). (U.S. Treasury) (Entered: 02/28/2020)
03/01/2020	<a href="#">56</a> (2 pgs)	BNC Certificate of Notice (Notice regarding Transfer of Claim) (RE: related document(s) <a href="#">55</a> ). Notice Date 03/01/2020. (Admin.) (Entered: 03/02/2020)
04/07/2020	<a href="#">57</a> (3 pgs; 3 docs)	Transfer of Claim. Transfer Agreement 3001 (e) 2 Transferor: Specialized Loan Servicing LLC (Claim No. 2) To U.S. Bank NA as Trustee to Lodge Series IV Trust. Filing fee due in the amount of \$ 25.00 for each transfer of claim. Notice sent to Parties. Filed by Emmanuel Joseph Argentieri of Romano Garubo & Argentieri on behalf of U.S. Bank National Association as trustee of Lodge Series IV Trust (Argentieri, Emmanuel) (Entered: 04/07/2020)
04/07/2020		Receipt of Transfer of Claim( <a href="#">1:18-bk-03800-HWV</a> ) [claims,trclm] ( 25.00) filing fee. Receipt number A9650308, amount \$ 25.00. (RE:

		related document(s) <a href="#">57</a> ). (U.S. Treasury) (Entered: 04/07/2020)
04/10/2020	<a href="#">58</a> (2 pgs)	BNC Certificate of Notice (Notice regarding Transfer of Claim) (RE: related document(s) <a href="#">57</a> ). Notice Date 04/10/2020. (Admin.) (Entered: 04/11/2020)
08/06/2020	<a href="#">59</a> (5 pgs)	Motion to Dismiss Ch. 13 Case for material default and Notice of Self Scheduled Hearing. Notice served on 8/6/2020. Filed by Trustee. Hearing scheduled for 09/09/2020 at 09:35 AM - U.S. Courthouse, 3rd fl, 228 Walnut Harrisburg, PA. (DeHart, III (Trustee), Charles) (Entered: 08/06/2020)
09/08/2020	<a href="#">60</a> (2 pgs; 2 docs)	Stipulation <i>Pay the arrears within 90 days of date of stipulation</i> Filed by Trustee (RE: related document(s) <a href="#">59</a> ). (Attachments: # <a href="#">1</a> Proposed Order) (DeHart, III (Trustee), Charles) (Entered: 09/08/2020)
09/08/2020	61	Hearing on 9/09/2020 canceled. Motion resolved by stipulation. (There is no image or paper document associated with this entry.) (RE: related document(s) <a href="#">59</a> ). (Goodling, Joan) (Entered: 09/08/2020)
09/08/2020	<a href="#">62</a> (2 pgs; 2 docs)	Order Approving Stipulation regarding Motion to Dismiss. (RE: related document(s) <a href="#">60</a> ). (McHugh, Michael) (Entered: 09/08/2020)
09/24/2020	<a href="#">63</a> (5 pgs; 3 docs)	Motion for Wage Attachment Order. Filed by John Matthew Hyams of Law Offices of John M. Hyams on behalf of Genevieve K. Froehlich (RE: related document(s) <a href="#">60</a> , <a href="#">62</a> ). (Attachments: # <a href="#">1</a> Proposed Order # <a href="#">2</a> Certificate of Service) (Hyams, John) (Entered: 09/24/2020)
09/25/2020	<a href="#">64</a> (2 pgs; 2 docs)	Order Granting Motion for Wage Attachment Order (RE: related document(s) <a href="#">63</a> ). (McHugh, Michael) (Entered: 09/25/2020)
09/27/2020	<a href="#">65</a> (2 pgs)	BNC Certificate of Notice (RE: related document(s) <a href="#">64</a> ). Notice Date 09/27/2020. (Admin.) (Entered: 09/28/2020)
10/08/2020	<a href="#">66</a> (2 pgs; 2 docs)	Notice to Filing Party (E. Argentieri): Discrepancy between CM/ECF entry and uploaded PDF. Image was not flattened. (Notice of Postpetition Mortgage Fees, Expenses and Charges) (Claim # 2). (RE: related document(s) <a href="#">doc</a> ). (Gambini, Christopher) (Entered: 10/08/2020)
04/30/2021	<a href="#">67</a> (3 pgs)	Order Amending All existing Wage Attachment Orders/Orders to Pay Trustee; and Motion by Successor Chapter 13 Trustee . (Stefano, Carol) (Entered: 04/30/2021)
04/30/2021	68	Notice of immediate reassignment of case to Trustee Jack N. Zaharopoulos due to retirement of Trustee Charles J. DeHart, III. (There is no image or paper document associated with this entry.) . (Stefano, Carol) (Entered: 04/30/2021)
07/27/2022	<a href="#">69</a> (5 pgs; 3 docs)	Amended Motion for Wage Attachment Order. Filed by John Matthew Hyams of Law Offices of John M. Hyams on behalf of Genevieve K. Froehlich (RE: related document(s) <a href="#">63</a> ). (Attachments: # <a href="#">1</a> Proposed Order # <a href="#">2</a> Certificate of Service) (Hyams, John) (Entered: 07/27/2022)
08/01/2022	<a href="#">70</a> (2 pgs; 2 docs)	Order Granting Amended Motion for Wage Attachment Order (RE: related document(s) <a href="#">69</a> ). (McHugh, Michael) (Entered: 08/01/2022)

08/03/2022

[71](#)  
(3 pgs)BNC Certificate of Notice (RE: related document(s)[70](#)). Notice Date  
08/03/2022. (Admin.) (Entered: 08/04/2022)**PACER Service Center****Transaction Receipt**

09/09/2022 16:54:00

<b>PACER Login:</b>	JenBonner	<b>Client Code:</b>	000003-erk
<b>Description:</b>	Docket Report	<b>Search Criteria:</b>	1:18-bk-03800-HWV Fil or Ent: filed Doc From: 0 Doc To: 99999999 Term: included Format: html Page counts for documents: included
<b>Billable Pages:</b>	7	<b>Cost:</b>	0.70

## VERIFICATION

I, BETH A. FRONHEISER being the Credit & Collections Manager at PPL Electric Utilities Corporation, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect PPL Electric Utilities Corporation to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

September 12, 2022

  
Beth A. Fronheiser