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September 15, 2022

**Via Electronic Filing**

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

Re: Kathleen 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, Esq.

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: September 15, 2022

*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, FSN 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. The telephonic hearing was rescheduled for January 11, 2022 on the Complaint. On December 21, 2021, ALJ Watson granted a continuance of this hearing due to counsel’s scheduling conflict.

6. By hearing notice dated August 11, 2022, the telephonic hearing has been rescheduled for September 29, 2022 at 10:00am. Hearing exhibits are due five (5) business days in advance of the hearing, on September 22, 2022.

7. FSN's witness will be traveling out of the country in late September through early October and will be unavailable for the hearing on September 29, 2022. FSN's witness has knowledge of the issues in this proceeding and FSN does not have another witness available to provide the necessary information.

8. 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.

9. FSN submits that the unavailability of its witness is "good cause" for granting a continuance.

10. Further, FSN has identified the following alternative dates on which its witness and counsel are available for a rescheduled telephonic hearing:

- October 6-7, 2022;
- October 11, 2022;
- October 18-21, 2022;
- The week of October 31, 2022;
- The week of November 7, 2022; or
- November 14-16, 2022.

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: September 15, 2022

Attorneys for  
Full Service Network, LP