

BEFORE THE
PENNSLVANIA PUBLIC UTILITY COMMISSION

RYAN FLYNN :
 :
 V. : NO. C-2024-3047272
 :
 PENNSYLVANIA -AMERICAN WATER COMPANY :

TO: ADMISISTRATIVE LAW JUDGE, ALPHONSO ARNOLD III; JUDGE OF SAID COURT

MOTION FOR CONTINUANCE

And now comes Plaintiff, Ryan Flynn, by and through counsel, Lawrence J. Rosen, Esquire, and offers the following averments in support of said Motion.

1. This matter is currently scheduled for a telephonic hearing for Tuesday, December 3, 2024 at 10:00 A.M.
2. Plaintiff, Ryan Flynn is asking Your Honorable Court for a continuance in this matter for the following reasons.
 - a. Plaintiff has e-filed with the Commission requests for several subpoenas which were e-filed on Thursday, November 21, 2024. Given the time constraints for properly serving the subpoenas and exhibits that would be presented to the witnesses for identification and testimony and the fact that this is a holiday weekend and the fact that approval has not been received, it would be difficult if not impossible to timely serve the proposed witnesses.
 - b. Plaintiff has recently become aware of certain facts that lead him to believe that his trailer part, Meadowbrook Trailer Park is being and has been treated in a discriminatory manner in regards to the way Defendant, Pennsylvania-American Water Company has treated him/his company since the inception of their relationship. He requires additional time to confirm his current belief(s) in that regard.
 - c. Plaintiff is asking Your Honorable Court to grant a continuance of at least sixty days or more to enable him to determine if his current suspicions are supported by the evidence.
 - d. Undersigned counsel has spoken with opposing counsel, Michael Gruin, and he has no objection to the requested continuance as Mr. Flynn has agreed to bring his bill current with a payment in the amount of \$162,472 by noon tomorrow.

Respectfully submitted:

LAGUNA, KREVSKY & ROSEN, PLLC

By:



Lawrence J. Rosen, Esquire

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RYAN FLYNN o/b/o
LIQUID MANAGEMENT,
Complainant

V.

PENNSYLVANIA-AMERICA
WATER COMPANY
Respondent

: NO. C-2024-3047272

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the 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 EMAIL:

MICHAEL A. GRUIN, ESQ
michael.gruin@stevenslee.com

DATE: 11/26/24

By: 

Lawrence J. Rosen