

Luisa Mascos & Roy Cummins

E 2019-3007989
C 2019-3007995

vs.
Met Bid

Answers to Interrogatories Set III

Nice try. Pursuant to PA 52 Code 5.349 (d) the party upon whom the request is served shall serve a ^{written} response within ten days for rate proceedings and twenty days after service of the request for all other cases.

Your fabricated three and five day deadlines are illegal. We already know you are venal and amoral. It is not necessary to go to such lengths to try to prove your moral turpitude.
Also Discovery ended!!

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Roy Cummins
Lita Maccios

2

- 1) Enclosed
- 2) See # 1
- 3) Mr. Bathgate cannot make such measurements until the end of March 2020. However, he is eminently aware, and erudite in the dangerous effects of smart meters.
a See 3 above.
- 4) Objection^{abc}. See above answers, by way of further response, Discovery ended in September 2019.
- 5) Mr. Bathgate cannot conduct measurements which are germane to this interrogatory until March 30, 2020.
- 6) Objection. Discovery ended September 2019.
a Objection, Discovery has ended. See # 5 and # 3.

Ray Cummins
Liza Mavros

3

- 7) Objection. Discovery ended September 2019.
- 8) a) Discovery ended September 2017
- 8) b) Asked and answered. By way of further response, Discovery ended September, 2019.
- 9) Objection. Discovery ended September 2019
- 10) Objection. Discovery ended September 2019
- 11) Objection. Discovery ended September 2019
- 11) a) ^{Objection} Discovery ended September 2019
- 11) b) Objection. Discovery ended September 2019
- 12) Mr. Bathgate has testified before the PA Legislature. ^{Objection} By way of further response, Discovery ended September 2019. You had ample time to propound these interrogatories previously.

13) Objection. Asked and answered and
Discovery ended September 2019.

14) Objection. Asked and answered and
Discovery ended September 2019.

15) Objection. Discovery ended September
2019.

16) Objection. Discovery ended
September 2019.

17) Objection. Discovery ended September
2019. By way of further response,
there is no personage named Hoy
Cummins.

18) Objection. Discovery ended September 2019.
a Objection. Discovery ended September 2019.
b Objection. Discovery ended September 2019.

(5)

- 19) Objection. Discovery ended September 2019
- 20) Objection. Discovery ended September 2019
- a) Enclosed
- 22) Objection. Discovery ended September 2019
Also N/A.
- a) See 22, Objection as Discovery ended September 2019
23. ~~Objection~~, Discovery ended September 2019
- a) ~~Objection~~, Discovery ended September 2019
- b) ~~Objection~~, Discovery ended September 2019
- 24) Objection. Discovery ended September 2019
- 25) Objection. Discovery ended September 2019
- a) Objection. Discovery ended September 2019

(6)

- 27) Objection. Discovery ended September 2019.
- a) Objection. Discovery ended September 2019.
- b) Objection. Discovery ended September 2019.
- 28) Objection. Discovery ended September 2019.
- a) Objection. Discovery ended September 2019.

Lisa Mausios Fisher 6/20/20 Roy Cummings
 Lisa Mausios 2/6/2020 Rylwin



01/12/2020

Liza Mousios
P O. Box 116
Revere, PA 18953-

To Whom It May Concern:

Since 1996, Ms. Mousios has resided the majority of the time at her home residence without incident. However, on or about March 27, 2019, she has been living in her car or tent since, beginning of the day after the a smart meter was installed at her adjacent next door neighbor's house. She continues to be itinerant, living in various locations including her car, a tent and intermittently at friends houses who do not have a smart meter or smart meter close to their house.

Prior to the instillation of the adjacent neighbors smart meter, she had been treated at our office for chronic kidney infections, multiple chemical intolerance syndrome and neuralgia pain from a motor vehicle accident.

However, she developed sudden and new symptoms upon the smart meter installation at the end of March, 2019. She was first evaluated at our office on 4/2/2019 with exposure related symptoms included stabbing chest pains, shortness of breath with tightness in the chest, headache, head and ear pressure with high-pitched ringing, joint and muscle pain. In addition she had new onset of vomiting blood and accompanying weight loss. At that office visit of 4/2/2019, she had physical examination findings revealing new thyroid fullness and swelling. Of note, and unrelated to her medical conditions, she also reports that her pet dogs began vomiting and losing weight.

Despite having to experience significant cold temperatures and wind conditions, her symptoms improved from living in her car or tent away from the smart meter. She also reported that when she was able to periodically stay with friends that did not have a smart meter nor any neighbor adjacent smart meter, her symptoms resolved. Anytime she would return to her residence, with the adjacent neighbor smart meter, her above-stated symptoms would return.

On 5/31/2019, at a follow up office visit, after the patient left her residence to avoid smart meter exposure, she had a repeat thyroid exam that was entirely normal.

In my medical opinion, to a reasonable degree of medical certainty, Ms. Mousios has electromagnetic hypersensitivity. Her smart meter exposure symptoms consistently recur upon exposure and dramatically improve with avoidance measures. The current smart meter at her adjacent neighbors home prevents her from residing in her residence in which she has a piano, and a companion, heat, shower and a bed. She is a professional musician and her piano is required in order for her to perform her music profession. Consequently, I medically recommend that her neighbors smart meter be removed or relocated at a significant distance from Ms. Mousios' residence.

Sincerely,

Provider:

Kracht DO, William 01/12/2020 3:58 PM

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William S. Bathgate

Certifications - PMP, ITIL, COBIT, CISA, CRISC, CISM, CGEIT

US DOD Top Secret Security Clearance

Bachelors of Sciences, Western Illinois University

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256-529-1076

Global Technology Professional

Professional Work History

2015 - 2018 TATA Consulting, Fiat Chrysler Automotive Account – Current Position

2015 – 2018 Global Program Manager – Auburn Hills, MI

Manager of Global Programs for enhancements of systems for MOPAR, Secure Vehicle. U-Connect Radio Systems, Connected Vehicle and Autonomous Vehicles. Reports directly to FCA Director of Systems Planning.

2009 - 2015 Emerson Electric Corporation, Avocent Division

2009 – 2015 Global Engineering Program Manager, Emerson Corporation, Avocent Div. – Huntsville, AL

Program Manager of a power distribution products portfolio. Responsible for global engineering development and release of newly developed electrical products engineered in the USA and Germany but built in Mexico and Czech Republic. This product is called MPH and MPH II. This is a computer network controlled high voltage and high amperage load control device engineered for worldwide installations adapted for each local countries either three phase and single phase AC distribution grid. As Program Manager I also provided direction and oversight of product safety testing and certifications, such as UL, CSA, CE, and PSE for product safety compliance in over 100 countries. So far over 1 Million units of the products I developed are in service. This role reported to the Vice President of Engineering of Emerson's Avocent Division.

1995–2009 Hewlett-Packard Co.

1995-2009 Managing Director, Computer Systems Engineering

Now this division is called "Keysight Technologies". Developed new automated instrument calibration systems and new circuit designs for oscilloscopes, high precision DC power supplies, EMI & EMC Measurements, Phase Noise, Physical Layer Test Systems, RF & Microwave Test Accessories, Device Current Waveform Analyzers, AC and DC power analyzers. Network analyzers and vector signal analyzers.

1983–1995 IBM Corporation

1983-1995 IBM Corporation, Electronic Systems Engineer, Systems Division – Armonk, New York

Developed Mainframe computer CPU, Memory and Input and Output peripherals for S/370 and S/3090 platforms. Part of the design team for the first IBM PC products, responsible for power supplies, main computer circuit boards and Operating Systems integration. Also assigned to NASA in Houston, Cape Canaveral and Marshall space flight centers for launch control and space vehicle telecommunications using high frequency and microwave RF signals.

1977–1983 Textron Corporation

1977-1983 Textron Corporation, Sundstrand Division, Control Systems Engineer – Rockford, IL

Developed Electronic Control Systems for control of Aerospace applications generating power for inflight services, control of engine start, elevators, rudder and aileron controls. Subcontractor to Lockheed Martin for enhancements to the flight data recorder (Black Box) improving circuit mountings for improved crash survival.

Developed control systems for off road construction equipment such as cement mixers, combines, bulldozers and high rise cranes.

Industry Certifications & Expertise

Certified Project Management Professional (PMI/PMP)
Certified in Governance of Enterprise IT (CGEIT)
Certified in Risk and Information Systems Control (CRISC)
Certified Information Systems Auditor (CISA)
Certified Information Security Manager (CISM)
Certified in Control Objectives of IT (COBIT)
Certified in Information Systems IT Infrastructure Library (ITIL) for Operations, Design and Configuration

FCC Amateur Extra Class License Holder
FCC Land Mobile License Holder
FCC Marine Mobile License Holder

High tech power management systems, UPS and power distribution
Switched Mode Power Supplies
Electrical and Electronic hardware engineering
Computer systems engineering
Radio Systems design and testing
High Current and High Voltage switches
Internet communications using both wired and wireless technologies
UL, CE (Europe), Africa, Japan, Australia and China product safety certifications
Cyber encryption and protection of Radio Communications using digital signals
RFI/EMI mitigation

Hold a US DOD Top Secret Clearance and am an instructor of information security encryption control and compliance to the US Missile Defense Agency, NASA, and US Department of Homeland Security.

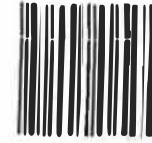
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Mr Roy A Cumming
PO Box 396
Revere, PA 18953



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