



900 Race Street
6th Floor
Philadelphia, PA 19107

Suzan DeBusk Paiva
Associate General Counsel
Suzan.d.paiva@verizon.com
(267) 768-6184

May 5, 2026

Via eFile

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: Verizon Pennsylvania LLC and Verizon North LLC v. Metropolitan Edison Company, Pennsylvania Electric Company, and Pennsylvania Power Company; Docket No. C-2020-3019347

Dear Secretary Homsher:

Enclosed please find Verizon's Motion to Suspend May 18, 2026 Deadline for Supplemental Direct Testimony and Set a Deadline for the Parties to Propose an Amended Procedural Schedule and Request for Expedited Motion Answer Deadline and Ruling to Metropolitan Edison Company, Pennsylvania Electric Company and Pennsylvania Power Company (together "First Energy") in the above captioned matter.

Please do not hesitate to contact me should you have any questions.

Sincerely,

Suzan D. Paiva

Cc via eFiling:

The Honorable John M. Coogan
Certificate of Service (attached)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Verizon Pennsylvania LLC and	:	
Verizon North LLC	:	
	:	
v.	:	C-2020-3019347
Metropolitan Edison Company, Pennsylvania	:	
Electric Company and Penn Power Company,	:	
now known as FirstEnergy Pennsylvania	:	
Electric Company	:	

NOTICE TO PLEAD

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA CODE § 5.103(c), YOU MAY FILE AN ANSWER TO THE ENCLOSED MOTION WITHIN TWENTY DAYS OF THE DATE OF SERVICE OR SUCH OTHER DEADLINE SET BY THE COMMISSION OR PRESIDING OFFICER. YOUR ANSWER SHOULD BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY OF YOUR ANSWER SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL:

	Suzan D. Paiva (Atty ID No. 53853)
	Verizon
	900 Race St., 6th Floor
	Philadelphia, PA 19107
	Telephone: 267-768-6184
	<u>Suzan.D.Paiva@verizon.com</u>
Christopher S. Huther (<i>pro hac vice</i>)	
Claire J. Evans (Atty ID No. 90091)	
Frank Scaduto (<i>pro hac vice</i>)	
Wiley Rein LLP	
2050 M Street NW	
Washington, DC 20036	
202-719-7000	
<u>chuther@wiley.law</u>	
<u>cevans@wiley.law</u>	
<u>fscaduto@wiley.law</u>	
	Curtis L. Groves (<i>pro hac vice</i>)
	Verizon
	1300 I Street NW
	Suite 500 East
	Washington, DC 20005
	202-515-2179
	<u>curtis.groves@verizon.com</u>

Counsel for Verizon Pennsylvania LLC and Verizon North LLC

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Verizon Pennsylvania LLC and	:	
Verizon North LLC	:	
	:	
v.	:	C-2020-3019347
Metropolitan Edison Company, Pennsylvania	:	
Electric Company and Penn Power Company	:	
now known as FirstEnergy Pennsylvania	:	
Electric Company	:	

**VERIZON’S MOTION TO SUSPEND MAY 18, 2026 DEADLINE FOR
SUPPLEMENTAL DIRECT TESTIMONY AND SET A DEADLINE FOR THE
PARTIES TO PROPOSE AN AMENDED PROCEDURAL SCHEDULE
AND
REQUEST FOR EXPEDITED MOTION ANSWER DEADLINE AND RULING**

Verizon Pennsylvania LLC and Verizon North LLC (“Verizon”) move under 52 Pa. Code §§ 1.15, 5.103, and 5.223(a) and paragraph 12 of the March 23, 2026 Scheduling Order for an Order (1) suspending Verizon’s May 18, 2026 Supplemental Direct Testimony deadline, and (2) setting a deadline for the parties to propose a new procedural schedule after the Commission decides Verizon’s pending motions and FirstEnergy Pennsylvania Electric Company (“FirstEnergy”) produces the discovery it has not objected to and any discovery it is compelled to provide. Given the May 18, 2026 deadline, Verizon also requests a Thursday, May 7, 2026 answer deadline and an expedited ruling.

I. Introduction

1. The Commission should suspend Verizon’s May 18, 2026 Supplemental Direct Testimony deadline for good cause: to allow time for rulings on Verizon’s pending motions, to account for FirstEnergy’s late discovery responses, and to avoid prejudicing Verizon. The Commission should also set a new deadline requiring the parties to file a joint statement proposing an amended procedural schedule within two business days after the last of three events: (1) a decision on the pending Motion to Amend, (2) a decision on the pending Motion to

Compel, and (3) FirstEnergy’s production of outstanding discovery, including responses to requests it has not objected to and those it is compelled to answer. Alternatively, the Commission should adopt a new procedural schedule giving Verizon until at least July 31, 2026 to serve its Supplemental Direct Testimony—time needed to account for FirstEnergy’s ongoing discovery delays, allow for decisions on the pending motions and any necessary follow-up (such as FirstEnergy’s filing of a responsive pleading and production of compelled documents), and accommodate the pre-existing commitments of Verizon’s counsel and witnesses.

2. FirstEnergy has withheld and delayed discovery that goes to the heart of the remand issues by lodging meritless objections to many of Verizon’s requests, ignoring Verizon’s informal resolution efforts, and failing to timely serve responses to requests it did not object to. Verizon’s supplemental direct testimony is due in less than two weeks, on May 18, 2026. To date, FirstEnergy has provided incomplete responses to two discovery requests, producing 238 detailed spreadsheets the day after responses were due and providing some of the requested information about annual rental amounts three days later. FirstEnergy’s responses to four discovery requests to which it did not object remain outstanding, as do its responses to the unobjected-to portions of the remaining requests. FirstEnergy itself has explained that parties “must timely receive the information and materials that are reasonably calculated to lead to the discovery of admissible evidence well in advance of the [deadline for their testimony], or else [they] will be denied due process.”¹ That cannot happen under the current schedule.

3. Additional time is also needed to clarify the pleadings. FirstEnergy opposes Verizon’s filing of an Amended Complaint to clarify the record, simplify the pleadings, and

¹ See FirstEnergy’s Motion to Dismiss Objections and Compel Responses to Interrogatories and Requests for Production of Documents – Set I at 6 (Apr. 29, 2020).

focus the remand proceedings on the issues the Supreme Court identified. FirstEnergy’s opposition lacks merit; it has also injected uncertainty into the proceeding that makes it impossible for Verizon to tailor its Supplemental Direct Testimony to the pleadings by May 18. Due process requires an “opportunity to be heard at a meaningful time and in a meaningful manner.” *Montefiore Hosp. Ass’n of W. Pa. v. Pa. PUC*, 421 A.2d 481, 484 (Pa. Cmwlth. 1980). For that opportunity to be meaningful, Verizon must have clarity about the scope of the relevant complaint—and any responsive pleadings—before submitting its testimony.

4. The Commission should suspend Verizon’s May 18 deadline, take the time it needs to resolve Verizon’s pending motions, and require the parties to file a joint statement with a proposed amended procedural schedule after decisions on the pending motions and FirstEnergy’s production of outstanding discovery.

II. Background

5. “When the FCC ordered electric utilities to charge competitively neutral rates in 2011,” FirstEnergy refused to lower its pole attachment rates to the “rate set by the Commission’s regulations for Verizon’s competitors.” Recommended Decision, Findings of Fact ¶ 10 (Sep. 15, 2020). FirstEnergy has since used a series of tactics to postpone the required rate reductions, deny Verizon needed information, and increase the costs and burdens Verizon must bear to obtain them—despite the Commission’s goals in asserting jurisdiction over pole attachments to “reduc[e] the time and resources spent on disputes,” expedite required pole attachment rate reductions, and eliminate “additional burdens and expenses” on broadband providers.²

² *Assumption of Comm’n Jurisdiction over Pole Attachments from the FCC*, No. L-2018-3002672, 2019 WL 4345730, at *6, *26 (Aug. 29, 2019) (“*Final Rulemaking Order*”).

6. FirstEnergy requested the current remand proceedings from the Pennsylvania Supreme Court and proposed that “[a]nswers to written interrogatories and requests for document production . . . be served in-hand within ten (10) calendar days of service.” Prehearing Conference Memorandum ¶ 65 (Mar. 13, 2026). The Scheduling Order expanded that deadline to 15 days, Scheduling Order ¶ 7 (Mar. 23, 2026), yet FirstEnergy missed even that expanded deadline. It lodged no objections to five discovery requests and only partially objected to others—yet FirstEnergy failed to provide a single response on the March 30 due date. Late the following afternoon, FirstEnergy provided a partial response to one request—238 data-rich spreadsheets that it failed to organize by pole owner as requested. On Monday, May 4, it provided another partial response to a single request; this time providing information responsive to unobjected-to portions of the request.

7. FirstEnergy also ignored Verizon’s effort to informally resolve its objections, forcing Verizon to file a Motion to Compel to obtain information needed to update the record and address the remand issues. Verizon’s Motion to Compel, filed April 30, 2026, may not be decided until May 15, 2026—the last business day before Verizon’s May 18 deadline. 52 Pa. Code § 5.342(g)(2) (“The motion should be decided within 15 days of its presentation, unless the motion presents complex or novel issues.”). Even if the Motion is decided sooner, Verizon and its witnesses will not have enough time to obtain the requested discovery (which may be voluminous), analyze it, and address it before the deadline.

8. FirstEnergy also insists on a Protective Order before producing confidential information, even though the parties already have a Stipulated Protective Agreement, *see* Mot. to Compel ¶¶ 36–38 & Exs. C, D, and FirstEnergy failed to timely file (and still has not filed) the required petition. 52 Pa. Code § 5.365(c)(4). FirstEnergy has inappropriately delayed production

of information critical to Verizon’s witnesses’ preparation of their Supplemental Direct Testimony.

9. FirstEnergy also opposed Verizon’s Amended Complaint, creating the need for additional time to clarify the pleadings. Had Verizon’s Amended Complaint been filed without objection in early April, FirstEnergy would have already filed its responsive pleadings. Instead, Verizon’s witnesses do not know which complaint to address in their Supplemental Direct Testimony, and FirstEnergy may file responsive pleadings 20 days after the Commission serves the Amended Complaint—meaning the responsive pleading deadline would be *after* Verizon’s May 18 deadline. *See* Answer to Mot. to Amend ¶ 82 (Apr. 20, 2026). Regardless of how promptly the Commission decides Verizon’s Motion, the current procedural schedule is untenable.

III. Argument

A. The Commission Should Suspend Verizon’s May 18 Deadline.

10. The Commission should suspend Verizon’s May 18 Supplemental Direct Testimony deadline “for good cause.” *See* 52 Pa. Code §§ 1.15, 5.223(a). *First*, suspending the deadline will avoid prejudice to Verizon, which bears the burden of proof and needs information uniquely in FirstEnergy’s possession that FirstEnergy has unreasonably denied and withheld. FirstEnergy did not answer any of Verizon’s discovery requests on time—even the ones it did not object to. It did not seek an extension, explain its disregard of the 15-day discovery deadline (when it had proposed a 10-day deadline), or reply to Verizon’s detailed April 24 email seeking informal resolution. FirstEnergy withheld confidential information despite the Commission’s rule requiring its production and failed to file the required petition for a protective order. 52 Pa. Code § 5.365(c)(4). It forced Verizon to spend time and resources preparing a Motion to Compel that cannot be resolved in time for Verizon to receive, analyze, and address the requested

discovery before its May 18 deadline. Now, with fewer than two weeks remaining, Verizon has received only partial responses to two requests—including 238 spreadsheets requiring analysis. The Commission should not countenance FirstEnergy’s continued effort to gain an improper advantage by withholding and delaying discovery needed for Verizon’s Supplemental Direct Testimony.

11. *Second*, suspending Verizon’s deadline will give the Commission time to rule on Verizon’s Motion to Amend and avoid the prejudice Verizon would suffer if forced to serve testimony without clarity about the operative pleadings. FirstEnergy has asked for a ruling on the Motion to Amend by May 6 and reserved the right to serve a responsive pleading 20 days after service of the Amended Complaint. *See* Answer to Mot. to Amend ¶¶ 84–86. The Commission should take whatever time it needs to resolve the Motion. But even if the Commission resolves it by May 6, FirstEnergy’s proposal would allow for responsive pleadings *after* Verizon’s May 18 deadline. Due process and fundamental fairness require suspending the May 18 deadline.

B. The Commission Should Set a Deadline for the Parties to Propose an Amended Procedural Schedule Following Rulings on the Pending Motions and FirstEnergy’s Production of Outstanding Discovery.

12. The Commission should require the parties to propose a new procedural schedule, informed by rulings on the two pending motions and FirstEnergy’s production of outstanding discovery. The parties should confer and submit a joint status report to the ALJ within two business days of the last of these three events, proposing a new procedural schedule and stating whether the other party agrees. Alternatively, the Commission should adopt a schedule giving Verizon until at least July 31, 2026 to serve its Supplemental Direct Testimony.

13. The new deadline must be extended enough to give Verizon time to receive, review, analyze, and follow up on FirstEnergy’s outstanding discovery responses. FirstEnergy has routinely provided untimely and incomplete discovery in this case. In the first phase,

FirstEnergy's responses were so late and incomplete during the accelerated schedule that Verizon filed a Motion to Compel, which led to FirstEnergy's assurances that it would complete its productions ten days after they were due. *See* Mot. to Compel (May 22, 2020); Letter to ALJ Cheskis (May 27, 2020). FirstEnergy also updated several initial discovery responses well after its discovery response deadline. *See, e.g.*, Verizon Statement 1.0, Exs. SCM-12, SCM-16, SCM-28, SCM-33, MSC-7, MSC-11, TJT-3, TJT-6.

14. FirstEnergy's timeliness has not improved. Having proposed a 10-day response deadline, FirstEnergy did not serve any responses by the 15-day deadline set in the Scheduling Order. To date, it has served only partial responses to two requests. One sought data about three field audits; FirstEnergy responded with 238 spreadsheets that are not organized by pole owner as requested and that contain only a fraction of the information sought. The other sought information about the rental amounts FirstEnergy seeks in this case; FirstEnergy's response to the unobjected portion of the request requires follow-up because it appears incomplete, providing a single pole count number per company, when Verizon asked for pole counts by company on an annual basis since 2020.³ The Commission must extend Verizon's deadline enough to give Verizon time to receive and analyze FirstEnergy's outstanding discovery responses and follow up if FirstEnergy continues to delay.

15. An adequate extension following a ruling on Verizon's Motion to Amend is also reasonable and necessary. The Motion should be granted; FirstEnergy's claim that a regulatory complaint cannot be amended post-remand depends entirely on a decision in a capital case where the Post Conviction Relief Act strictly limits the timing of "second or subsequent petitions," and

³ Pole counts are used for invoicing purposes and vary from company to company and year to year based on the addition and removal of facilities to poles.

the appellate court ordered a “limited remand” on issues that did *not* include the *Brady*, newly discovered evidence, and ineffective assistance of counsel claims raised for the first time on remand. *Commonwealth v. Sepulveda*, 144 A.3d at 1276, 1279 (Pa. 2016), cited at Answer to Mot. to Amend ¶¶ 13–16, 26–28, 48. This case, by contrast, is governed by the Commission’s liberal amendment rules⁴ and a Supreme Court decision considering the same pole attachment rate dispute and remanding for further proceedings considering the specific Pennsylvania legal authorities cited in Verizon’s Amended Complaint. *See* Motion to Amend Ex. A; *FirstEnergy Pa. Elec. Co. v. Pa PUC*, 349 A.3d 165, 175–79 (Pa. 2026). The core dispute has not changed: FirstEnergy’s pole attachment rates are unjust, unreasonable, and discriminatory; must be reduced; and Verizon’s prior overpayments must be refunded. Amending the complaint to include the “most salient” Pennsylvania legal authorities the Commission must consider on remand, *id.* at 175, simply makes sense.

16. If Verizon’s Motion to Amend is granted, FirstEnergy will have 20 days to file responsive pleadings—the only responsive pleadings it will have filed at the Commission in this case. *See* Answer to Mot. to Amend ¶ 86. Verizon should have enough time to review those pleadings, seek discovery about them, pursue discovery disputes as needed, and prepare testimony addressing FirstEnergy’s arguments. If Verizon’s Motion to Amend is denied (and it

⁴ FirstEnergy’s claim that Verizon “relies on legal authorities that do not apply and are readily distinguishable,” Answer to Mot. to Amend ¶ 46, is incorrect and attempts to sidestep significant authority Verizon relied upon, including Section 5.91, which FirstEnergy agrees “governs the amendment of pleadings generally” and permits amendments without leave up to “5 days preceding the commencement of or during a hearing” and with leave thereafter, *id.* ¶¶ 9–10, Section 1.18(a), which allows parties to tender an amendment “for filing at any time,” 52 Pa. Code § 1.81(a), and precedent authorizing an amendment at any stage in a litigation “to prevent cases from turning on purely technical defects” and “to promote resolution of cases on their merits,” *Biglan v. Biglan*, 479 A.2d 1021, 1025–26 (Pa. Super. 1984) (cited at Mot. to Amend ¶¶ 5, 13).

should not be), Verizon would still need time to determine whether to seek reconsideration or appeal, while reviewing and addressing FirstEnergy's outstanding discovery responses and balancing the pre-existing commitments of its counsel and witnesses in late Spring and early Summer.

17. FirstEnergy will not be prejudiced by suspending Verizon's deadline and adopting a new procedural schedule. *First*, there is no risk that the case will revert to the Federal Communications Commission ("FCC") because of the extension; the presiding officer has tentatively concluded that the 270-day deadline for a decision under federal law does not apply to this remand proceeding. And regardless, Verizon will not ask the FCC to reassert jurisdiction based on Verizon's own extension request. Nor would a transfer of jurisdiction be prejudice—it would simply determine who enters the final decision requiring FirstEnergy to charge the just, reasonable, and non-discriminatory rates required by federal and Pennsylvania law.

18. *Second*, FirstEnergy will not be prejudiced based on its claim that Verizon owes significant amounts because it "has not made any rental payments. . . since the inception of this case." Answer to Mot. to Amend ¶ 74. Verizon disputes this allegation and—while this Motion is not the place to resolve that factual dispute—the allegation confirms the need for relief. Verizon sought discovery on this issue, including information about FirstEnergy's rate calculations, reasons for not invoicing pole attachment rent, and view of the potential impact of this litigation. *See* Mot. to Compel, Ex. A at Request Nos. 1, 3, 4. Although responses were due on April 30, FirstEnergy has not yet responded to these Requests.

19. *Third*, suspending Verizon's deadline and extending the procedural schedule would serve the parties and the Commission by eliminating appellate issues that would arise if this case proceeds under the current schedule. Due process and fundamental fairness entitle

Verizon to clarity about the pleadings and sufficient opportunity to receive and review FirstEnergy's late discovery responses before being required to meet its burden of proof. FirstEnergy advocated for these remand proceedings. The Commission should ensure they are conducted in a manner that respects Verizon's due process rights.

C. The Commission Should Expedite the Response Deadline for this Motion, and Its Ruling.

20. The Commission and its presiding officer have authority to shorten FirstEnergy's response deadline, 52 Pa. Code § 5.103(c), and should do so to ensure a prompt decision on this Motion well before Verizon's May 18, 2026 deadline. Verizon requests that FirstEnergy be ordered to respond on or before Thursday, May 7, 2026—sufficient time to address this straightforward extension request.

21. Verizon also respectfully requests that the Commission or its presiding officer expedite a ruling and suspend Verizon's May 18, 2026 deadline. Verizon's witnesses just received 238 spreadsheets to analyze and are still waiting for the vast majority of FirstEnergy's late discovery responses so they can understand and analyze FirstEnergy's allegations, develop positions, and prepare their testimony. To avoid prejudice to their schedules, Verizon requests prompt relief from the May 18 deadline.

IV. Conclusion

22. The Commission or presiding officer should (1) suspend Verizon's May 18, 2026 Supplemental Direct Testimony deadline, and (2) set a new deadline requiring the parties to submit a joint statement proposing an amended procedural schedule within two business days after the last of three events—a decision on the pending Motion to Amend, a decision on the pending Motion to Compel, and FirstEnergy's production of outstanding discovery, including responses to requests it has not objected to and those it is compelled to answer.

23. Alternatively, the Commission should adopt a new procedural schedule that provides Verizon until at least July 31, 2026 to serve its Supplemental Direct Testimony.

Respectfully submitted,



Suzan D. Paiva (Atty ID No. 53853)
Verizon
900 Race St., 6th Floor
Philadelphia, PA 19107
Telephone: 267-768-6184
Suzan.D.Paiva@verizon.com

Curtis L. Groves (*pro hac vice*)
Verizon
1300 I Street NW
Suite 500 East
Washington, DC 20005
202-515-2179
curtis.groves@verizon.com

Christopher S. Huther (*pro hac vice*)
Claire J. Evans (Atty ID No. 90091)
Frank Scaduto (*pro hac vice*)
Wiley Rein LLP
2050 M Street NW
Washington, DC 20036
202-719-7000
chuther@wiley.law
cevans@wiley.law
fscaduto@wiley.law

Counsel for Verizon Pennsylvania LLC and Verizon North LLC

Dated: May 5, 2026

VERIFICATION

I, Stephen C. Mills, state that I am employed as Principal Engineer, Network Engineering, Verizon, and that as such I am authorized to make this verification on behalf of Verizon Pennsylvania LLC and Verizon North LLC (“Verizon”). I have reviewed the facts set forth above, and verify that they are true and correct to the best of my knowledge, information, and belief and that I expect Verizon to be able to prove the same at a hearing held in this case. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 5, 2026



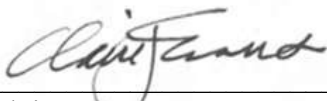
Stephen C. Mills

CERTIFICATION

I, Claire J. Evans, counsel for Verizon Pennsylvania LLC and Verizon North LLC (“Verizon”) certify that I sought in good faith to informally resolve the issues raised in this motion with counsel for FirstEnergy Pennsylvania Electric Company (“FirstEnergy”). I sent an email to FirstEnergy’s counsel on May 4, 2026 and requested a response by 3 p.m. on May 5, 2026. I also offered to discuss the issues by telephone. Counsel for FirstEnergy responded shortly before 11 a.m. on May 5 and stated that FirstEnergy opposes the relief Verizon seeks in this Motion.

Counsel for FirstEnergy further stated that “FirstEnergy is willing to discuss proposals related to the schedule in this matter.” I replied and expressed Verizon’s ongoing willingness to discuss adjustments to the procedural schedule and requested FirstEnergy’s availability. Counsel for FirstEnergy has not yet responded. To ensure this matter can be resolved sufficiently in advance of Verizon’s May 18 deadline, and in light FirstEnergy’s stated opposition to the relief sought, Verizon is filing this Motion but remains open to further discussions with FirstEnergy.

Date: May 5, 2026



Claire J. Evans

CERTIFICATE OF SERVICE

I, Suzan D. Paiva, hereby certify that I have this day served a true copy of Verizon's Motion to Suspend May 18, 2026 Deadline for Supplemental Direct Testimony and Set a Deadline for the Parties to Propose an Amended Procedural Schedule and Request for Expedited Motion Answer Deadline and Ruling upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (related to service by a participant) and 1.55 (related to service upon attorneys).

Dated at Philadelphia, Pennsylvania, this 5th day of May, 2026.

VIA E-MAIL

[mailto:David B. MacGregor](mailto:David.B.MacGregor@postschell.com)
dmacgregor@postschell.com

Anthony D. Kanagy
akanagy@postschell.com

Devin T. Ryan
DRyan@postschell.com

Garrett P. Lent
GLent@postschell.com

Tori L. Giesler
tgiesler@firstenergycorp.com

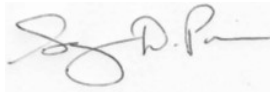
Jessica Rhea
jrhea@firstenergycorp.com

Curtis L. Groves
Curtis.groves@verizon.com

Claire J. Evans
CEvans@wiley.law

Christopher S. Huther
CHuther@wiley.law

Frank Scaduto
FScaduto@wiley.law



Suzan D. Paiva
Pennsylvania Bar ID No. 53853
900 Race Street, 6th Floor
Philadelphia, PA 19107
(267) 768-6184

Attorney for Verizon