

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

CAMPBELL, et al.,)	
)	
Complainant,)	
)	
v.)	Case No. 17-0520-EL-CSS
)	
OHIO EDISON COMPANY,)	
)	
Respondent.)	
)	

**OHIO EDISON COMPANY’S STIPULATED MOTION FOR CONTINUANCE OF
HEARING DATE**

Respondent Ohio Edison Company (collectively, the “Parties”), hereby files this stipulated motion with the Public Utilities Commission of Ohio (“Commission”) to vacate the hearing in this case currently set for October 5, 2017, and to continue the hearing for approximately forty (40) days. The Parties respectfully request that a mutually agreeable hearing date be determined through consultation between the Parties and the Attorney Examiner in this proceeding. The Parties further respectfully request that the deadline for pre-filed expert testimony be continued to seven (7) days prior to the new hearing date, in accordance with Rule 4901-1-29(A)(1)(h), Ohio Administrative Code. Because the hearing in this matter is seven (7) days away, the Parties request an expedited ruling on this Stipulated Motion in accordance with Rule 4901-1-12(C), Ohio Administrative Code. The reasons for this Stipulated Motion are fully set forth in the attached memorandum in support.

Respectfully submitted,

/s/ Joshua R. Eckert

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Counsel of Record

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MEMORANDUM IN SUPPORT

On August 22, 2017, the Attorney Examiner issued an Entry scheduling an evidentiary hearing in this matter for October 12, 2017. Since that time, Complainants Jack Campbell, Jeff Campbell, and Jeff Campbell, Jr. (“Complainants”) and Respondent Ohio Edison Company (collectively, the “Parties”) have engaged in discovery, including the depositions of the Complainants. The Parties, however, need additional time to complete discovery.

Recently, Complainants made a verbal request to counsel for Ohio Edison Company indicating that they need additional time to complete further discovery in this matter. After discussion with Complainants, Ohio Edison Company has agreed to support a continuance of this matter to allow for the completion of further discovery and, accordingly, is filing this Stipulated Motion for a continuance of the hearing in this matter. Thus, the Parties respectfully request that the current hearing date in this matter be vacated and the hearing be continued for approximately forty (40) days, with a mutually agreeable hearing date to be determined through consultation between the Parties and the Attorney Examiner in this proceeding. The Parties further respectfully request that the deadline for pre-filed expert testimony be continued to seven (7) days prior to the new hearing date, in accordance with Rule 4901-1-29(A)(1)(h), Ohio Administrative Code. Finally, because the hearing is currently seven (7) days away, the Parties respectfully request an expedited ruling on this Stipulated Motion in accordance with Rule 4901-1-12(C), Ohio Administrative Code.

For the foregoing reasons, the Commission should grant this Stipulated Motion.

Respectfully submitted,

/s/ Joshua R. Eckert

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Ohio Edison Company's Stipulated Motion for Continuance of Hearing Date and Memorandum in Support have been served upon the following by electronic mail and U.S. mail on this 5th day of October, 2017.

Jack Campbell, et al.
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/s/ Joshua R. Eckert
An Attorney for Ohio Edison
Company

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Summary: Motion --Ohio Edison Company's Stipulated Motion for Continuance of Hearing Date and Memorandum in Support electronically filed by Mr. Joshua R. Eckert on behalf of Ohio Edison Company