

FILE

BEFORE

RECEIVED-DOCKETING DIV

THE PUBLIC UTILITIES COMMISSION OF OHIO

2014 AUG -6 PM 3:41

MILLERSVILLE CONSTRUCTION

Complainant

PUCO

VS.

CASE NO. 14-366-TP-CSS

FRONTIER NORTH INC.

Respondent

**MOTION FOR CONTINUANCE AND NOTICE OF MOTION FOR CONTINUANCE**

Comes now **MILLERSVILLE CONSTRUCTION**, Complainant, in the above-captioned case, and respectfully moves that this Commission grant a continuance on the Settlement Hearing issued by Entry dated *April 24, 2014*. The grounds for this Motion are (1) to allow Discovery between parties and (2) for reasons unknown, Millersville Construction did not receive a copy of any Commission Entry through the United States mail, prior the Entries listed below.

This Motion is based (1) *first* and *second* Entries received by US mail on July 26, 2014, *third* Entry received by certified mail, and information provided by the *Answer and Affirmative Defenses of Frontier North Inc.* filed by Michelle Noble (Thompson Hine LLP 0072756).

(1) The *first* Entry sets forth, by order, the Discovery process between parties in accordance with Findings (5).

(2) The *second* and *third* Entry sets forth, by order, Millersville Construction under Findings (4, 5, and 6) to specify to the Commission, by letter "a proposed date upon which a settlement conference shall be held."

(3) **Answer and Affirmative Defenses of Frontier North Inc.**, under, Section B Affirmative Defenses, informs the Commission that Frontier "disconnected Complainant's service on March 10, 2014." Thus, the Complainant is no longer reachable via business telephone listed in the complaint.

Wherefore, Complainant respectfully moves the Commission to grant continuance on a Settlement hearing *fourteen days* after the closing of Discovery matters, to accept

this Motion as a letter in accordance with the *second* and *third* Entry orders, and to forward all Commission Entries by certified or United States mail.

**NOTICE OF MOTION FOR CONTINUANCE**

You, the Commission are hereby notified that *fourteen days* after the completion of Discovery matter(s) between parties or as soon thereafter the Complainant can be heard before the Commission located at the Offices of the Commission, 180 East Broad Street, 11<sup>th</sup> floor, Hearing room 11-D, Columbus, Ohio 43215-3793, the Complainant will bring on for hearing his **Motion for Continuance** for the reasons stated in the above Motion.

**Respectfully Submitted,**

A handwritten signature in black ink, appearing to read 'GK', is written over a horizontal line.

**Complainant**

Glenn Kreais (Owner)

925 CR72

Helena, Oh 43435