BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

CHARLOTTE PAOLUCCI,)	
Complainant,)	
V.)	Case No. 15-1124-WW-CSS
AQUA OHIO, INC.,)	
Respondent.)	
)	

MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING AND REQUEST FOR EXPEDITED TREATMENT OF AQUA OHIO, INC.

In accordance with Ohio Adm. Code 4901-1-12 and 4901-1-13, Aqua Ohio, Inc. (Aqua or the Company) respectfully requests an extension of time to file a responsive pleading in this case until July 10, 2015. Good cause exists to grant this motion, which is detailed below.

On June 17, 2015, the Complainant filed her complaint. Investigating the complaint's factual allegations has required Aqua to coordinate with various employees in different departments. Despite the Company's best efforts, this investigation will not be completed in time to allow an answer to be filed on the due date of July 8, 2015. To allow Aqua time to complete this factual investigation, conduct legal review, and draft the answer, Aqua requests an extension of the due date until July 10, 2015.

The Company represents that this request is not being made for the purposes of delay and requests expedited treatment of this motion in accordance with Ohio Adm. Code 4901-1-12(C).

For the foregoing reasons, Aqua respectfully requests that the Commission grant its request for an extension of time to file a responsive pleading until July 10, 2015, on an expedited basis.

Dated: July 8, 2015

Respectfully submitted,

/s/ Andrew J. Campbell

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(All counsel are willing to accept service by email)

ATTORNEYS FOR AQUA OHIO, INC.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion was served by U.S. mail this 8th day of July, 2015, to the following:

Charlotte Paolucci 6201 Lucas Ave. Ashtabula, OH 44004

/s/ Rebekah J. Glover
One of the Attorneys for Aqua Ohio, Inc.

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Case No(s). 15-1124-WS-CSS

Summary: Motion for Extension of Time to File Responsive Pleading and Request for Expedited Treatment electronically filed by Ms. Rebekah J. Glover on behalf of Aqua Ohio, Inc.