

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

FJN THREE, LLC,)	
)	
and)	
)	
FRANK NICODEMO,)	
)	
Complainants,)	Case No. 17-1565-WW-CSS
)	
v.)	
)	
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 August 7, 2017. Good cause exists to grant this motion, which is detailed below.

On July 10, 2017, the Complainants filed their 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 31, 2017. 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 August 7, 2017.

The Company represents that counsel for the Complainants have no objections to this request. The Company further 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 August 7, 2017, on an expedited basis.

Dated: July 27, 2017

Respectfully submitted,

/s/ Andrew J. Campbell
Mark A. Whitt (0067996)
Andrew J. Campbell (0081485)
Rebekah J. Glover (0088798)
WHITT STURTEVANT LLP
The KeyBank Building, Suite 1590
88 East Broad Street
Columbus, Ohio 43215
Telephone: (614) 224-3946
Facsimile: (614) 224-3960
whitt@whitt-sturtevant.com
campbell@whitt-sturtevant.com
glover@whitt-sturtevant.com

(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 27th day of July, 2017, to the following:

Richard A. Nicodemo
Law Office of Richard A. Nicodemo
124 15th Street, NW
Canton, Ohio 44703

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

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Commission of Ohio Docketing Information System on

7/27/2017 2:06:58 PM

in

Case No(s). 17-1565-WW-CSS

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