

FILE

5

CITY OF MARIETTA

Office of the Law Director
259 Butler Street, Suite 200
Marietta, Ohio 45750

Paul G. Bertram, III
Law Director

Telephone: 740-373-4171
Facsimile: 740-376-2013

April 26, 2018

Barcy F. McNeal, Secretary
Tanowa Troupe, Acting Secretary
Susan Patterson, Acting Secretary
Beverly Hoskinson, Acting Secretary
OHIO PUBLIC UTILITIES COMMISSION
180 East Broad Street
Columbus, OH 432150-3793

RECEIVED-DOCKETING DIV
2018 APR 27 PM 2:46
PUCO

Re: The East Ohio Gas Company d/b/a/ Dominion Energy Ohio
vs
The City of Marietta, Ohio
CASE NO. 18-0290-GA-PWC

Dear Madames:

Enclosed please find a "Motion For Extension of Time In Which To File Answer" that I am submitting on behalf of the City of Marietta, Ohio. As you can see from this "Motion", I am requesting that the date for filing the Respondent's "Answer", be extended to May 14, 2018.

The "Motion" is self-explanatory. Due to vacations, a death, and sickness, I have been unable to meet with the various people that I need to gather information from, so that I can draft an Answer.

I have emailed a copy of my "Motion" and "Entry" to each of the three (3) attorneys whose names appear on the Complaint as being counsel for the Complainant, requesting that one of them execute the Entry and forward it back to me so that I may file it. I received a response from two (2) of those attorneys stating that they would have to check with their client, but that they did NOT believe it would be a problem for me to file my Answer on or before May 14, 2018. One of the attorneys that responded to my email, suggested that I file my "Motion" now. Then when they reach their client, they will forward the "Entry" back to me. Once I receive the "Entry", I will forward it under separate cover. Also, one of the attorneys that responded to my

This is to certify that the images appearing are an
accurate and complete reproduction of a case file
document delivered in the regular course of business.
Technician Am Date Processed 4/27/18

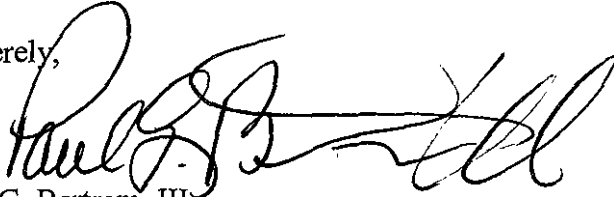
email stated that he would send an email to the "Assigned Hearing Examiner" putting him or her on notice that I am requesting an extension of time.

Wherefore, please file the enclosed "Motion". I have included four (4) copies of the "Motion" so that a file-stamped copy may be sent back to me in the enclosed, self-addressed, stamped envelope, and so that each of the three (3) attorneys representing the Complainant may receive a file-stamped copy.

Thank you for your consideration in this matter.

If you have any questions, please don't hesitate to contact me at (740) 373-4171.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul G. Bertram, III", with a long horizontal flourish extending to the right.

Paul G. Bertram, III
Marietta City Law Director

III:nr

Encs.

BEFORE

CASE NO. 18-0290-GA-PWC

**MOTION FOR EXTENSION OF
TIME IN WHICH TO FILE
ANSWER**

Respondent.

Comes now, The City of Marietta, Ohio, Respondent herein, by and through counsel,

Utilities Commission of Ohio for an extension of time in which to file an Answer on behalf of the

Respondent.

MEMORANDUM IN SUPPORT

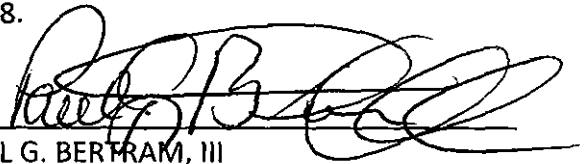
A copy of the Complaint in this matter was delivered by mail to the Marietta Municipal

Complaint was then forwarded to the Marietta City Law Director's Office, and received while I

was out of town on vacation. Upon my return from vacation, I attempted to contact the clerk of the Engineering Department in an attempt to schedule an appointment so that I could gather the information needed to respond to the Complaint, only to find that the clerk was out of the office due to the death of her father. The Engineer was also out of the country on a family vacation. I then attempted to contact the Chairman of the Streets and Transportation Committee for the City of Marietta only to find that she was too sick to meet with me. Furthermore, a meeting was scheduled today (April 25, 2018) for me to meet with the Engineering Department, but the meeting had to be cancelled due to the unavailability of the Engineer's office who could not meet with me because of unforeseen circumstances that arose. With that said, I am requesting an extension of time so that I can meet with the various people involved in this matter and adequately prepare an Answer on behalf of the City of Marietta.

WHEREFORE, I am requesting that The City of Marietta, Ohio be permitted to file its Answer no later than May 14, 2018.

Respectfully submitted this 25th day of April, 2018.



PAUL G. BERTRAM, III
Ohio Supreme Court Reg. No. 0041285
Marietta City Law Director
259 Butler Street
Marietta, OH 45750
Telephone: (740)373-4171
Email: paulgbertram3@mariettaoh.net

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the "Motion For Extension Of Time In Which To File Answer" was served upon the following persons via email on the 25th day of April, 2014.

Mr. Mark A. Whitt (#0067996)

Mr. Andrew J. Campbell (#0081485)

Ms. Rebekah J. Glover (#0088798)

WHITT STURTEVANT LLP

The Key Bank Building, Suite 1590

88 East Broad Street

Columbus, Ohio 43215

whitt@whitt-sturtevant.com

campbell@whitt-sturtevant.com

glover@whitt-sturtevant.com

Attorneys for The East Ohio Gas Company d/b/a/ Dominion Energy Ohio



PAUL G. BERTRAM, III (#0041285)

Marietta City Law Director

Attorney for Respondent