

FILE

**LAW OFFICES  
OF  
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PUCO  
180 East Broad Street  
Columbus, Ohio 43215

July 3, 2019

SUBJECT: Motion to extend time  
Case No. 19-52-AU-ORG filed for Citizens Coalition

Dear People,

Enclosed is a Legal Pleading of Coalition to extend time for filing.

Please file this.

We are sending 25 copies overnight express mail., 3 pages each copy.

Thanks you very much.

Respectfully submitted,

Joseph Meissner, Attorney  
Registration Number 0022366

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PUCO

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Technician A Date Processed 7/23/19

**BEFORE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's            )  
Review of Ohio Administrative Code        )       Case No. 19-52-AU-ORD  
Chapters 4901:1-17 and 4901:1-18.        )

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**MOTION FOR POSSIBLY NEEDED EXTENSION OF TIME**

**FOR FILING INITIAL COMMENTS IN THIS PROCEEDING**

**BY**

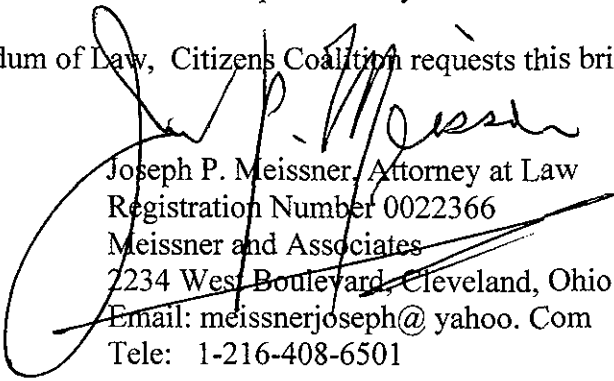
**THE CITIZENS COALITION**

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The Citizens Coalition through its counsel Attorney Joseph Meissner attempted to file Initial Comments allowed in this current proceeding. These were due Friday, July 19, 2019. The attempt was by both email and by fax. It is possible through the fault of Counsel that this filing of the Initial Comments was not done properly.

Citizens Coalition will be filing this Motion for a brief extension of filing time by FAX today July 22, 2019, which is one business day after these should have been properly filed with the Commission. The date of the FAXING of this current motion will be today July 22, 2019, and all emailing service needed on parties should be completed today.

Based on attached Memorandum of Law, Citizens Coalition requests this brief extension.



Joseph P. Meissner, Attorney at Law  
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MEMORANDUM OF LAW

Ohio Administrative Rule 4901-1-13 provides for extension of time as follows:

(A) .....extensions of time to file pleadings or other papers may be granted upon motion of any party for good cause shown, or upon motion of the commission, the legal director, the deputy legal director, or an attorney examiner.

(B) A motion for an extension of time to file a document must be timely filed so as to permit the commission, legal director, deputy legal director, or attorney examiner sufficient time to consider the request and to make a ruling prior to the established filing date

The PUCO docketing Section does have some documentation which shows that the Citizens Coalition did attempt to file timely. This may have been improperly submitted by this counsel.

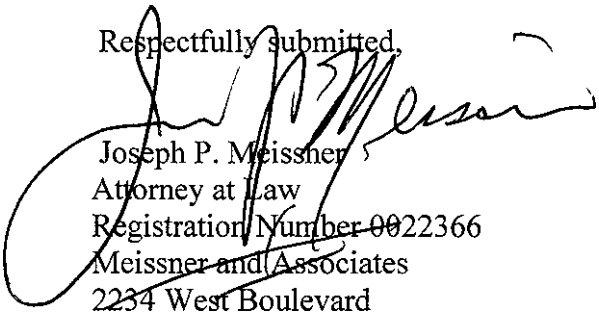
There are a number of facts which lead to a conclusion that “for good cause shown” this Motion for a brief extension of filing time should be allowed.

If this Motion is required and that the date of July 19, 2019, for the filing requirement was not met by the Citizens Coalition, then this Attorney has had a number of illness problems (involving eyesight as well as of knees, the latter affecting movement). Much pain also results from the knees. This should constitute “good cause shown” for any lateness in filing the Initial Comments.

Finally, this counsel last week had two other major legal projects which had to be completed on limited time availability.

Finally, Counsel would point out that this is only business day late, that this is the only opportunity to submit initial comments on a very crucial matter for low-income families, and there is very little prejudice to other parties from the short delay.

Respectfully submitted,

  
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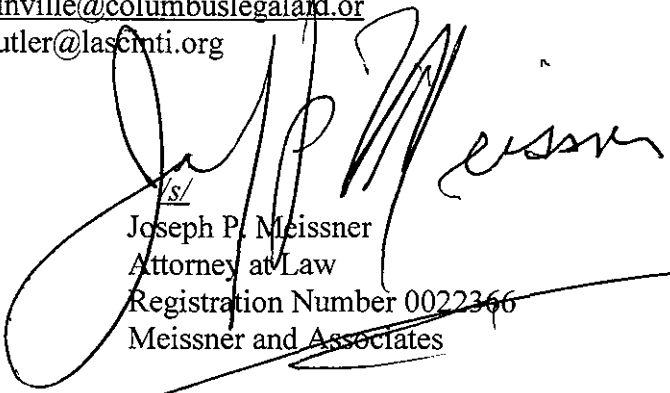
## CERTIFICATE OF SERVICE

I hereby certify that a copy of this Motion was served on the persons stated below via electronic transmission, this 22nd day of July 2019. These Comments from the Citizens Coalition are being faxed at this time to the PUCO to comply with the administrative rules..

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/s/  
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