

**BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO**

Container Graphics Corporation, )  
)  
CGC, )  
)  
v. ) Case No. 21-0925-EL-CSS  
)  
Talen Energy Marketing, LLC, )  
)  
and )  
)  
The Toledo Edison Company, )  
)  
Respondents. )

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**JOINT MOTION OF TALEN ENERGY MARKETING, LLC, THE TOLEDO EDISON COMPANY AND CONTAINER GRAPHICS CORPORATION FOR A SECOND EXTENSION OF TIME TO ANSWER THE COMPLAINT**

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Pursuant to Ohio Administrative Code Sections 4901-1-12 and 4901-1-13, Talen Energy Marketing, LLC, The Toledo Edison Company and Container Graphics Corporation (the “Parties”) move to extend the deadline to, and including, November 30, 2021, to answer and otherwise respond to the Container Graphics Corporation’s (“CGC”) Complaint. For the reasons set forth in the accompanying memorandum in support, the Parties request an order granting their motion for an extension of time to file an answer and otherwise respond to the Complaint. Pursuant to Rule 4901-1-12(C), the Parties request an expedited ruling on this request.

Respectfully submitted,

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## MEMORANDUM IN SUPPORT

Under OAC 4901-1-13, “extensions of time to file pleadings or other papers may be granted upon motion of any party for good cause shown.” CGC filed its Complaint on September 8, 2021, and the current deadline to file an answer and otherwise respond to the Complaint is October 28, 2021. An initial extension was granted from September 28, 2021 to the current answer deadline of October 28, 2021. Good cause exists for a second extension to November 30, 2021 because settlement discussions are continuing and the extension of time will allow the Parties to discuss and focus on settlement rather than expending time and incurring expense on litigation. Accordingly, the Parties move for an order extending the deadline to, and including, November 30, 2021, for Talen Energy Marketing, LLC and The Toledo Edison Company to answer and otherwise respond to the Complaint.

Given the pending answer date of October 28, 2021, the Parties request an expedited ruling on this request pursuant to Rule 4901-1-12(C). Counsel for Talen Energy Marketing, LLC certifies that all other parties were contacted (CGS and The Toledo Edison Company) and no party objects to the issuance of an expedited ruling.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on October 26th, 2021. The PUCO's e-filing system will electronically service notice of the filing of this document on counsel for all parties. A courtesy copy was emailed to the following parties this 26th day of October, 2021.

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**This foregoing document was electronically filed with the Public Utilities  
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**Case No(s). 21-0925-EL-CSS**

Summary: Motion Joint Motion of Talen Energy Marketing, LLC, The Toledo Edison Company and Container Graphics Corporation for a Second Extension of Time to Answer the Complaint electronically filed by Mr. Michael J. Settineri on behalf of Talen Energy Marketing, LLC