

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.)	

**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**

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,

/s/ Dane Stinson (per authorization)
Dane Stinson (0019101)
Counsel of Record
Bricker & Eckler LLP
100 South Third Street
Columbus, OH 43215-4291
Telephone: (614) 227-4854
Facsimile: (614) 227-2390
Email: dstinson@bricker.com

/s/ Michael J. Settineri
Michael J. Settineri (0073369)
Counsel of Record
Vorys, Sater, Seymour and Pease LLP
52 E Gay Street
Columbus, OH 43215
Telephone: (614) 464-5462
Facsimile: (614) 719-5146
Email: mjsettineri@vorys.com

Attorneys for Container Graphic Corporation Attorneys for Talen Energy Marketing, LLC

/s/ Emily V. Danford (per authorization)

Emily V. Danford (0090747)

Counsel of Record

FirstEnergy Service Company

76 South Main Street

Akron, OH 44308

Telephone: (330) 384-5849

Email: edanford@firstenergycorp.com

Attorneys for The Toledo Edison Company

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,

/s/ Dane Stinson (per authorization)
Dane Stinson (0019101)
Counsel of Record
Bricker & Eckler LLP
100 South Third Street
Columbus, OH 43215-4291
Telephone: (614) 227-4854
Facsimile: (614) 227-2390
Email: dstinson@bricker.com

/s/ Michael J. Settineri
Michael J. Settineri (0073369)
Counsel of Record
Vorys, Sater, Seymour and Pease LLP
52 E Gay Street
Columbus, OH 43215
Telephone: (614) 464-5462
Facsimile: (614) 719-5146
Email: mjsettineri@vorys.com

Attorneys for Container Graphic Corporation Attorneys for Talen Energy Marketing, LLC

/s/ Emily V. Danford (per authorization)

Emily V. Danford (0090747)

Counsel of Record

FirstEnergy Service Company

76 South Main Street

Akron, OH 44308

Telephone: (330) 384-5849

Email: edanford@firstenergycorp.com

Attorneys for The Toledo Edison Company

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.

/s/ Michael J. Settineri

Michael J. Settineri

Dane Stinson

dstinson@bricker.com

Emily Danford

edanford@firstenergycorp.com

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

10/26/2021 2:25:18 PM

in

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