

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

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

**JOINT MOTION OF
TALEN ENERGY MARKETING, LLC,
THE TOLEDO EDISON COMPANY
AND
CONTAINER GRAPHICS CORPORATION
FOR AN EXTENSION OF TIME TO ANSWER THE COMPLAINT
AND
REQUEST FOR EXPEDITED RULING**

Pursuant to Ohio Administrative Code 4901-1-12 and 4901-1-13, Talen Energy Marketing, LLC, The Toledo Edison Company and Container Graphics Corporation (collectively, the “Parties”) move to further extend the deadline to answer and otherwise respond to the Container Graphics Corporation’s (“CGC”) Complaint in this matter. 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 to December 30, 2021.

Pursuant to Ohio Administrative Code 4901-1-12(C), the Parties also request an expedited ruling on this joint motion because the current answer date is approaching.

Respectfully submitted,

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**MEMORANDUM IN SUPPORT OF THE JOINT MOTION OF
TALEN ENERGY MARKETING, LLC,
THE TOLEDO EDISON COMPANY
AND
CONTAINER GRAPHICS CORPORATION
FOR AN EXTENSION OF TIME TO ANSWER THE COMPLAINT
AND
REQUEST FOR EXPEDITED RULING**

Under Ohio Administrative Code 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 November 30, 2021. Extensions were granted previously at the request of the Parties because they have been engaged in settlement discussions. Good cause exists for a further extension to December 30, 2021 – positive settlement discussions are ongoing and the extension of time will allow the Parties to continue focusing on reaching settlement rather than expending time and incurring expense on litigation. Accordingly, the Parties jointly move for an order extending the deadline to, and including, December 30, 2021, for Talen Energy Marketing, LLC and The Toledo Edison Company to answer and otherwise respond to the Complaint.

Given the pending answer deadline of November 30, 2021, the Parties also request an expedited ruling on this joint motion pursuant to Ohio Administrative Code 4901-1-12(C). All Parties agree to the issuance of an expedited ruling.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio's e-filing system will electronically service notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served (via electronic mail) on the 24th day of November 2021 upon all persons/entities listed below.

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/s/ Michael J. Settineri
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in

Case No(s). 21-0925-EL-CSS

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