

**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.	)	

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**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**

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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 January 30, 2022.

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,

/s/ Dane Stinson\*

Dane Stinson (0019101)  
Bricker & Eckler LLP  
100 South Third Street  
Columbus, OH 43215-4291  
Telephone: (614) 227-4854  
Facsimile: (614) 227-2390  
Email: [dstinson@bricker.com](mailto:dstinson@bricker.com)

*Attorney for Container Graphic Corporation*

/s/ Michael J. Settineri\*

Michael J. Settineri (0073369)  
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](mailto:mjsettineri@vorys.com)

*Attorneys for Talen Energy Marketing, LLC*

/s/ Emily V. Danford

Emily V. Danford (0090747)  
FirstEnergy Service Company  
76 South Main Street  
Akron, OH 44308  
Telephone: (330) 384-5849  
Email: [edanford@firstenergycorp.com](mailto:edanford@firstenergycorp.com)

*Attorney for The Toledo Edison Company*

*\*Consent to sign provided by email.*

**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 December 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 January 30, 2022 – 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, January 30, 2022, for Talen Energy Marketing, LLC and The Toledo Edison Company to answer and otherwise respond to the Complaint.

Given the pending answer deadline of December 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,

/s/ Dane Stinson\*

Dane Stinson (0019101)  
Bricker & Eckler LLP  
100 South Third Street  
Columbus, OH 43215-4291  
Telephone: (614) 227-4854  
Facsimile: (614) 227-2390  
Email: [dstinson@bricker.com](mailto:dstinson@bricker.com)

*Attorneys for Container Graphic Corporation*

/s/ Michael J. Settineri\*

Michael J. Settineri (0073369)  
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](mailto:mjsettineri@vorys.com)

*Attorneys for Talen Energy Marketing, LLC*

/s/ Emily V. Danford

Emily V. Danford (0090747)  
FirstEnergy Service Company  
76 South Main Street  
Akron, OH 44308  
Telephone: (330) 384-5849  
Email: [edanford@firstenergycorp.com](mailto:edanford@firstenergycorp.com)

*Attorney for The Toledo Edison Company*

*\*Consent to sign provided by email.*

### **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 22nd day of December 2021 upon all persons/entities listed below.

Dane Stinson  
[dstinson@bricker.com](mailto:dstinson@bricker.com)

Michael Settineri  
[mjsettineri@vorys.com](mailto:mjsettineri@vorys.com)

/s/ Emily V. Danford  
*Attorney for The Toledo Edison Company*

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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 Extension of Time to Answer the Complaint and Request for Expedited Ruling electronically filed by Ms. Emily V. Danford on behalf of The Toledo Edison Company