

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of Dorcella Washington, : Case No. 21-304-TR-CVF
Notice of Apparent Violation and Intent : (OH3280006921D)
to Assess Forfeiture. :

MOTION FOR CONTINUANCE
SUBMITTED ON BEHALF OF THE STAFF OF
THE PUBLIC UTILITIES COMMISSION OF OHIO

The Staff of the Public Utilities Commission of Ohio (Staff) respectfully moves for a continuance of the hearing currently scheduled for March 14, 2023. The Staff needs additional time to receive contact information for material witnesses related to this incident. Staff requests that the hearing be rescheduled for a later time. In addition, once the material witnesses are contacted, Staff would like the opportunity to propose a new hearing date based on the availability of these witnesses.

Staff also requests that an expedited ruling be issued pursuant to O.A.C. 4901-1-12(C). Staff has been unable to contact Dorcella Washington (Respondent) due to her phone number nor email address being readily available. Staff also requests that a prehearing conference be held prior to the hearing. The reasons for this motion are set forth more fully in the attached memorandum.

Respectfully submitted,

Dave A. Yost
Ohio Attorney General

John H. Jones
Section Chief

/s/ Rhiannon D. Howard

Rhiannon D. Howard

Thomas Lindgren

Assistant Attorney General

Public Utilities Section

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MEMORANDUM IN SUPPORT

On March 26, 2021, Respondent's attorney, Jessica Reese, submitted a request for an administrative hearing with the Public Utilities Commission of Ohio (Commission) in the above-captioned proceeding. Due to pending criminal litigation, this proceeding was stayed on May 19, 2021. On November 1, 2022, Respondent's criminal case concluded.

On January 17, 2023, Respondent's attorney, Jessica Reese, withdrew as counsel. By entry dated January 18, 2023, the Commission set a date for an evidentiary hearing to begin on March 14, 2023 at 10:00 a.m.

The Staff needs additional time to secure contact information for material witnesses related to this case. Specifically, the Staff needs contact information for the Lab Technician who conducted urinalysis related to this case and contact information for the Ohio State Highway Patrolman who collected the sample from Respondent. Staff requests that the hearing be rescheduled at a future time.

Staff also requests that an expedited ruling be issued pursuant to O.A.C. 4901-1-12(C). The Respondent's attorney has withdrawn from the case and Staff does not have readily available contact information in order to contact Respondent in a timely manner. Accordingly, Staff respectfully requests an expedited ruling to momentarily continue the hearing currently scheduled on March 14, 2023. Staff requests that a prehearing conference be held prior to the hearing. In addition, once the witnesses are contacted,

Staff would like the opportunity to propose a new hearing date based on the availability of these witnesses.

Respectfully submitted,

Dave A. Yost
Ohio Attorney General

John H. Jones
Section Chief

/s/ Rhiannon D. Howard

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Thomas Lindgren

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PROOF OF SERVICE

I hereby certify that a true copy of the foregoing **Motion for Continuance** submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served upon Dorcella Washington, 1947 Sunbury Road, Columbus, OH 43219, by regular U.S. mail, postage prepaid, and/or via electronic mail, this 28th day of February 2023.

/s/ Rhiannon D. Howard

Rhiannon D. Howard

Assistant Attorney General

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

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in

Case No(s). 21-0304-TR-CVF

Summary: Motion for Continuance Submitted on Behalf of the Staff of the Public
Utilities Commission of Ohio electronically filed by Mrs. Kimberly M. Naeder on
behalf of PUCO