

LAW OFFICES  
PINNOLA & BOMSTEIN

MICHAEL S. BOMSTEIN  
PETER J. PINNOLA

ELKINS PARK OFFICE  
8039 OLD YORK ROAD  
ELKINS PARK, PA 19027  
(215) 635-3070  
FAX (215) 635-3944

100 SOUTH BROAD STREET, SUITE 2126  
PHILADELPHIA, PA 19110  
(215) 592-8383  
FAX (215) 574-0699  
EMAIL mbomstein@gmail.com

MT. AIRY OFFICE  
7727 GERMANTOWN AVENUE, SUITE 100  
PHILADELPHIA, PA 19119  
(215) 248-5800

REPLY TO:  
Center City

January 18, 2019

*Via Electronic Filing*

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, Second Floor  
Harrisburg, PA 17120

Re: Meghan Flynn, et al. v. Sunoco Pipeline L.P., C-2018-3006116  
FLYNN REPLY TO SUNOCO'S NEW MATTER

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission is Complainants' Reply to Sunoco's New Matter in the above referenced proceeding.

Thank you for your courtesies and cooperation.

Very truly yours,

  
MICHAEL S. BOMSTEIN

MSB:mik  
Encl.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MEGHAN FLYNN	:	
ROSEMARY FULLER	:	
MICHAEL WALSH	:	
NANCY HARKINS	:	
GERALD MCMULLEN	:	DOCKET NO. C-2018-3006116
CAROLINE HUGHES and	:	
MELISSA HAINES	:	DOCKET NO. P-2018-3006117
Complainants	:	
v.	:	
SUNOCO PIPELINE L.P.,	:	
Respondent	:	

**COMPLAINANTS' REPLY TO SUNOCO'S NEW MATTER**

Complainants, having been served with Sunocos' Answer to Amended Formal Complaint with New Matter, and desiring to respond thereto, hereby answer as follows:

119 - 130. Denied. Each of these averments contains conclusions of law to which no responsive pleading is required.

WHEREFORE, Complainants request that their Amended Formal Complaint not be dismissed.

Respectfully submitted,

Michael S. Bomstein

Michael S. Bomstein, Esq.  
PINNOLA & BOMSTEIN  
PA I.D. NO. 21328  
100 South Broad Street, Suite 2126  
Philadelphia, PA 19110  
Tel.: (215) 592-8383  
Email: [mbomstein@gmail.com](mailto:mbomstein@gmail.com)

Attorney for Complainants

Dated: January 18, 2019

**CERTIFICATE OF SERVICE**

I hereby certify that on this day, January 18, 2019, 2018, a true and correct copy of the foregoing has been served upon the following persons via electronic mail, pursuant to 52 Pa. Code § 1.54.

Diana A. Silva, Esquire  
[dsilva@mankogold.com](mailto:dsilva@mankogold.com)  
Robert D. Fox, Esquire  
[rfox@mankogold.com](mailto:rfox@mankogold.com)

Neil S. Witkes, Esquire  
[nwitkes@mankogold.com](mailto:nwitkes@mankogold.com)  
**Manko Gold Katcher & Fox LLP**  
401 City Ave, Suite 901  
Bala Cynwyd, PA 19004  
*Counsel for Sunoco Pipeline L.P.*

Thomas J. Sniscak, Esquire  
[tjsniscak@hmslegal.com](mailto:tjsniscak@hmslegal.com)  
Kevin J. McKeon, Esquire  
[kjmckeon@hmslegal.com](mailto:kjmckeon@hmslegal.com)  
Whitney E. Snyder, Esquire  
[wesnyder@hmslegal.com](mailto:wesnyder@hmslegal.com)  
**Hawke McKeon and Sniscak LLP**  
100 N. Tenth Street  
Harrisburg, PA 17101  
*Counsel for Sunoco Pipeline L.P.*

Rich Raiders, Esquire  
**Raiders Law**  
321 East Main Street  
Annville, PA 17003  
[rich@raiderslaw.com](mailto:rich@raiderslaw.com)  
*Counsel for Andover Homeowners'  
Association, Inc.*

Anthony D. Kanagy  
**Post & Shell PC**  
17 North Second St., 12th Floor  
Harrisburg, PA 17101-1601  
[akanagy@postschell.com](mailto:akanagy@postschell.com)  
*Counsel for Range Resources*

*s/ Michael S. Bomstein*  
Michael S. Bomstein, Esq.  
Pinnola & Bomstein  
PA ID No. 21328  
Email: [mbomstein@gmail.com](mailto:mbomstein@gmail.com)  
Suite 2126 Land Title Building  
100 South Broad Street  
Philadelphia, PA 19110  
Tel.: (215) 592-8383