

PAUL, FLANDREAU & BERGER, LLP

Attorneys At Law
320 WEST FRONT STREET
MEDIA, PENNSYLVANIA 19063
www.pfbllaw.com

EDWARD R. PAUL
JAMES R. FLANDREAU
TIMOTHY A. BERGER
DENISE E. MURRAY

(610) 565-4750
FAX (610) 565-5294

OF COUNSEL
PETER A. MARDINLY*
*MASTER OF LAWS (TAXATION)

February 21, 2019
Via Electronic Filing

Rosemary Chiavetta, Esquire
Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

**RE: Meghan Flynn, Rosemary Fuller, Michael Walsh, Nancy Haskins, Gerald McMullen, Caroline Hughes and Melissa Haines v. Sunoco Pipeline, L.P.
Docket Nos. P-2018-3006117, Docket No. C-2018-3006116**

Dear Secretary Chiavetta:

Attached for filing in the above-referenced matter is the Petition to Intervene of Middletown Township.

Thank you.

Very truly yours,


JAMES R. FLANDREAU

JRF:dem
Enclosure
cc: Mark Kirchgasser (w/enclosure)
Certificate of Service

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Megan Flynn, Rosemary Fuller	:	
Michael Walsh, Nancy Harkins	:	
Gerald McMullen, Caroline Hughes	:	
And Melissa Haines	:	
	:	Docket No. C-2018-3006116
v.	:	Docket No. P-2018-3006117
	:	
Sunoco Pipeline, L.P.	:	

PETITION TO INTERVENE OF MIDDLETOWN TOWNSHIP

Middletown Township (hereinafter “Middletown” or “Petitioner”), by and through its attorneys, Paul, Flandreau & Berger, LLP, pursuant to 52 Pa. Code Sections 5.71 through 5.76, hereby Petitions to Intervene in the above-captioned consolidated proceedings and in support of its intervention, represents as follows:

I. Introduction

1. Petitioner is Middletown Township with its principal office located at 27 N. Pennell Road, Lima, PA 19037.

2. Petitioner is represented by the following attorney whose contact information is:

James R. Flandreau, Esquire
Paul, Flandreau & Berger, LLP
320 W. Front Street
Media, PA 19063
(610) 565-4750
jflandreau@comcast.net

3. Counsel for Middletown is authorized to accept service on its behalf. Middletown requests that the Commission and all parties of record serve copies of all documents (including

but not limited to correspondence, discovery requests, answers, Commission orders (pleadings and testimony) electronically on its counsel of record as well as by hard copy.

4. On November 19, 2018, Meghan Flynn, Rosemary Fuller, Michael Walsh, Nancy Harkins, Gerald McMullen, Caroline Hughes and Melissa Haines (collectively hereinafter the “Complainants”) filed a Complaint against Respondent Sunoco Pipeline, L.P. (hereinafter “Sunoco”) at Docket No. C-2018-3006116 and, concurrently therewith, a Petition for Interim Emergency Relief against Sunoco at Docket No. P-2018-3006117, which have been consolidated.

5. The Complaint alleged that Mariner East I (hereinafter “ME1”) Mariner East 2 (“ME2”), Mariner East 2X (“ME2X”), and the 12 inch work around pipeline (collectively the “ME Pipelines”) which are owned and operated by Sunoco are being operated without an adequate emergency notification system or legally adequate emergency management plans and that, as a result, the Complainants are at imminent risk of catastrophic and irreparable loss, including loss of life, serious injury to life, and damage to their homes and property. The Complainants contend that Sunoco’s actions constitute unreasonable, unsafe, inadequate and insufficient service which violates Section 1501 of the Pennsylvania Public Utility Code.

6. The Complainants filed an Amended Complaint on November 19, 2018, alleging that the highly volatile liquids pipeline mishaps that have occurred, together with the data collected by the Commission’s Bureau of Investigation and Enforcement, strongly suggest that Sunoco’s integrity management program is not functioning in compliance with applicable law and that the valve sites for highly volatile liquids pipelines are particularly high-risk areas.

7. Sunoco filed its Answer to the Amended Complaint on January 7, 2019 denying the allegations.

8. Sunoco filed Preliminary Objections to the Amended Complaint on January 10, 2019.
9. The Honorable Elizabeth H. Barnes is presiding over the consolidated proceedings.

II. Middletown's Interest in the Proceedings

9. The Petitioner is a township in Delaware County, Pennsylvania, approximately 13.47square miles in area with an approximate population of 16,000.

10. The ME pipelines cross or are proposed to cross the entire length of Middletown Township.

11. Middletown and its residents are directly affected by the ME pipelines, particularly as it relates to public safety.

12. Middletown granted Sunoco four (4) permanent easements, three (3) permanent access road easements and a temporary construction access agreement (collectively the "Easements") on Middletown property. The easements have been recorded in Delaware County.

13. As an inducement for granting the easements to Sunoco, Sunoco additionally entered into a Side Letter Agreement with Middletown in order to set forth additional terms and conditions applying to Sunoco's use of the property covered by the Easements.

14. Glenwood Elementary School is located in Middletown. Approximately 440 students attend Glenwood Elementary School.

15. The ME2 pipeline is approximately 600 feet from the western boundary of the Glenwood Elementary School and 900 feet from the Glenwood Elementary School building. Additionally, there is a Sunoco valve station located immediately behind Glenwood Elementary School.

16. Due to the close proximity of the ME2 pipeline to Glenwood Elementary School, Middletown adopted Ordinance 795 amending §275-198 E of the Township Code to prohibit any

type of excavation work within a right of way occupied by a natural gas liquids pipeline that is within ¼ mile of the property line of any school in Middletown during the hours of 7 AM through 6 PM while the school is in session. A true and correct copy of §275-198 E attached hereto as Exhibit “A”.

17. An incident occurred in Middletown Township on May 21, 2018, when a recently installed and inactive section of ME2 was struck by a backhoe operated by a subcontractor of Aqua America because Aqua and Energy Transfer Partners (“ETP”) failed to ascertain the correct location of the pipeline. Middletown was never directly contacted by ETP about the incident. A true and correct copy of the letters dated June 14, 2018 from Middletown addressed to Governor Wolf and Gladys Brown, Chairperson of the Public Utility Commission detailing the incident are attached hereto as Exhibit “B”.

18. Middletown has addressed its concerns for the health and wellbeing of its residents to Gladys Brown, Chairperson of the Public Utility Commission, demanding greater efforts on the part of ETP to enhance communication and education in Middletown. A true and correct copy of the letter dated January 16, 2019 is attached hereto as Exhibit “C”.

III. Grounds for Middletown’s Intervention

19. Middletown’s eligibility to intervene is governed by Section 5.72 of the Public Utility Commission’s regulations, 52 Pa. Code §5.72.

20. Sunoco is required under the Code to maintain safe and reasonable facilities. 66 Pa. C.S. §1501.

21. Sunoco chose to locate its pipeline facilities using existing and acquired easements that traverse densely populated areas in Middletown including residential areas, an elementary school, senior life care centers, businesses, and public parks.

22. The allegation of lack of adequate emergency planning and public education and awareness directly affect the ability of Middletown to monitor and implement an emergency evacuation plan.

23. Middletown will be irreparably harmed if Sunoco does not ensure the safety of its facilities located in Middletown.

24. Middletown has a direct and substantial interest in the instant proceeding which is not, and cannot be, adequately represented by any other party. Therefore, Middletown satisfies the Public Utility Commission's standards for intervention set forth in 52 Pa. Code § 5.72 (a)(2).

IV. Requested Relief

25. Middletown seeks intervention to request the following relief:

- (a) That the Commission order Sunoco to work with Delaware County and Middletown emergency responders to develop an appropriate and comprehensive emergency plan by providing Delaware County and Middletown emergency responders all proprietary information necessary to develop such a plan and other public safety information that may be useful to public safety planners and emergency services providers.
- (b) That the Commission order Sunoco to establish testing as to the condition of the ME pipelines and reporting of testing results to Delaware County and Middletown officials.
- (c) That the Commission order Sunoco to develop and submit testing and inspection protocols appropriate to ensure the safe operation and maintenance of the ME pipelines throughout their entire course through Middletown Township.
- (d) That the Commission order Sunoco to provide advanced notification to Delaware County and Middletown of any proposed excavation in the area of the ME pipelines.

- (e) That the Commission order Sunoco to disclose to Middletown when work crews or inspectors will be anywhere in Middletown Township.
- (f) That the Commission order Sunoco to disclose to Middletown any damage or potential damage to Middletown facilities or property resulting from the operation or maintenance of the ME pipelines.
- (g) That the Commission order Sunoco to develop and install a mass early warning notification system for all potentially affected properties located within Middletown that would provide immediate notice of a leak, release, potential explosion, or other failure in the ME pipeline system to the public.
- (h) That the Commission order Sunoco to assist Delaware County and Middletown officials in devising an emergency plan for first responders in the event of a leak, release, explosion, or other failure in the ME pipeline system.
- (i) That the Commission order Sunoco to engage in emergency planning with Delaware County and Middletown emergency responders to develop a pipeline-specific hazard response plan, which said engagement includes, but is not limited to, participation in “tabletop” activities designed to provide emergency responders with opportunities to work through a variety of hazard scenarios.
- (j) That the Commission order Sunoco to assist Delaware County and Middletown officials in developing a specific comprehensive public education and awareness plan designed to inform and educate the public and Delaware County and Middletown officials and staff on proper and effective disaster prevention and disaster response.

(k) That the Commission order Sunoco to provide Delaware County and Middletown agencies responsible for public safety along the ME Pipeline routes with any and all information required under state and federal law to enable the preparation of emergency preparedness plans.

(l) That the Commission inspect and evaluate the safety of the pipeline and prepare a plan to implement the findings of its inspection and evaluation.

(m) Such further appropriate relief necessary to ensure the safety of the Middletown residents as may become available during the proceedings in this matter.

WHEREFORE, Middletown Township requests that the Commission grant its Petition to Intervene and authorize its intervention and participation in the consolidated proceedings as a full and active party.

Respectfully submitted,

PAUL, FLANDREAU & BERGER, LLP

BY: 

James R. Flandreau, Esquire (ID#39562)

320 W. Front Street

Media, PA 19063

(610)565-4750

jflandreau@pfblaw.com

Dated:

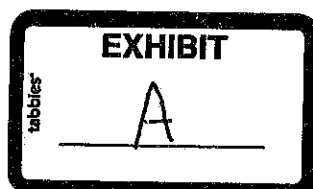
2-21-19

Chapter 275. Zoning

Article XXXIII. General Provisions

§ 275-198. Use requirements and restrictions.

- A. General restrictions on use. No building may be erected, altered or used, and no lot or premises may be used for any trade, industry or business that is hazardous to the public whether by fire, explosion or otherwise. In determining whether a proposed use is hazardous, each such use shall be analyzed according to the environmental controls of this article.
- B. No internal combustion engine shall be used unless objectionable noise and vibration are eliminated and safe disposition is made of exhaust gases.
- C. No more than one permitted principal use shall be permitted on a lot.
- D. No activities which require the moving of earth or the filling or excavation of an area shall occur without a permit issued by the Township Engineer. Finish grading or incidental grading of a lot and minor earth moving from one place to another on a lot for such activities as landscaping or pond maintenance may not require such a permit. The deposit and storage of soils, detritus or other debris shall be done in a way which is not unsightly or detrimental to surrounding properties, streets, sewers and natural watercourses.
- E.** It shall be unlawful for any person, persons or business entity of any type, or their principals, officers, agents, and employees, to engage in earthmoving, drilling, grading or any type of excavation work, including, but not limited to, any activities that require a permit pursuant to § 275-198D, within a right-of-way occupied by a natural gas liquids pipeline that is within 1/4 mile of the property line of any school in the Township during the hours of 7:00 a.m. to 6:00 p.m. while the school is in session.
[Added 9-10-2018 by Ord. No. 795]
- F. Any person, persons or business entity found guilty of violating any of the foregoing provisions shall be subject to a fine of \$600 per day per violation, upon conviction before a Magisterial District Judge. Should any act of assembly permit a fine in an amount greater than \$600, the greater of that amount or \$600 shall be permissible.
[Added 9-10-2018 by Ord. No. 795]



COUNCIL MEMBERS

AT LARGE
NORMAN C. SHROPSHIRE
MARK KIRCHGASSER
SUSAN K. POWELL

FIRST DISTRICT
SCOTT D. GALLOWAY

SECOND DISTRICT
WALTER (BOB) READ

THIRD DISTRICT
RUSS CARLSON

FOURTH DISTRICT
STEPHEN BYRNE

TOWNSHIP OF MIDDLETOWN

DELAWARE COUNTY, PENNSYLVANIA

www.middletowntownship.org

27 N. PENNELL ROAD

P.O. BOX 157

LIMA, PA 19037-0157



610-565-2700

FAX 610-566-3640

MANAGER
W. BRUCE CLARK

ENGINEER
KELLY & CLOSE ENGINEERS

SOLICITOR
JOSEPH A. DAMICO, JR., ESQ

June 14, 2018

Governor Tom Wolf
C/O Nedia S. Ralston
Director, Southeast Regional Office
110 North 8th Street; Suite 505
Philadelphia, PA 19107

RE: Support to Cease Construction of Mariner East 2 (ME2)

Honorable Governor Tom Wolf:

On May 21 2018, a recently installed and inactive section of Mariner East 2 (ME2) was struck by a backhoe operated by an employee of a subcontractor of Aqua America. This incident occurred on Lenni Road in our municipality of Middletown Township, Delaware County, during an Aqua excavation while installing a water main. The line was struck because Aqua and Energy Transfer Partners (ETP) failed to ascertain the location of the pipe. Despite the sensitive nature of the ME2 project, and both oral and written understandings that Middletown Township be provided with prompt notification of incidents occurring within the Township, Energy Transfer Partners never directly contacted the Township. Both our Municipal leadership and our residents find the happening of the accident and the failure to communicate to be utterly unacceptable.

The Middletown community has four (4) neighborhoods interrupted by HDD drill sites. There have been multiple reportable inadvertent returns requiring ongoing maintenance to prevent additional spills. DEP has shut down our HDD sites for numerous violations. Middletown Township deserves greater control and oversight by our leadership at the State.

The Middletown community has the right to expect excellence in every aspect of this installation. We have not received excellence. Instead, we have been confronted with lax oversight of an excavation site leading to contact between a backhoe and the ME2 pipe. We are fortunate that the pipe was not yet operative, but what if...?

Middletown Township has no means to control how ETP chooses to install this line, but the PUC does. Under these circumstances, Middletown Township Council hereby requests that you order a halt to the construction of the Mariner East 2 pipelines in Middletown Township until



such time as the PUC has completed a thorough investigation of the accident involving Aqua, its contractors and ME2 and the construction practices that led to the incident. It is the Township's understanding that such an investigation is already underway. It is imperative that the investigation be conducted in a rigorous fashion, and that the results be communicated directly to the Township. Without such an investigation, the Township cannot provide assurances to its citizens that Mariner East is being installed in the safest possible fashion. The Township needs accurate information on the location of the pipeline within rights-of-way shared with other utilities, and must be guaranteed that all future excavation work in the vicinity of Mariner East will be conducted to the highest possible standards of safety.

Middletown Township Council is dedicated to protecting the health, safety, and welfare of all members of the community. Recent events have raised concerns that Energy Transfer Partners may be more focused on expedient construction than on citizen safety. If that is the case, it is intolerable. Our citizens are understandably alarmed. They are entitled to be assured that the governmental entities with jurisdiction over this project are requiring that ME2 is installed with the utmost care. They have a right to expect excellence in all aspects of the construction and maintenance of the pipelines.

Thank you for your consideration of our request. We look forward to your reply and we look ahead to the completion of your investigation.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Haines', with a long horizontal flourish extending to the right.

Andrew S. Haines
Township Manager

c: Township Council
James Flandreau, Esq.

COUNCIL MEMBERS

AT LARGE
NORMAN C. SHROPSHIRE
MARK KIRCHGASSER
SUSAN K. POWELL

FIRST DISTRICT
SCOTT D. GALLOWAY

SECOND DISTRICT
WALTER (BOB) READ

THIRD DISTRICT
RUSS CARLSON

FOURTH DISTRICT
STEPHEN BYRNE

TOWNSHIP OF MIDDLETOWN
DELAWARE COUNTY, PENNSYLVANIA
www.middletowntownship.org

27 N. PENNELL ROAD
P.O. BOX 157
LIMA, PA 19037-0157



610-565-2700
FAX 610-566-3640

MANAGER
W. BRUCE CLARK

ENGINEER
KELLY & CLOSE ENGINEERS

SOLICITOR
JOSEPH A. DAMICO, JR., ESQ

June 14, 2018

Ms. Gladys M. Brown, Chairperson
Public Utility Commission
400 North King Street
Keystone Building
Harrisburg, PA 17120

RE: Support to Cease Construction of Mariner East 2 (ME2)

Dear Ms. Brown:

On May 21 2018, a recently installed and inactive section of Mariner East 2 (ME2) was struck by a backhoe operated by an employee of a subcontractor of Aqua America. This incident occurred on Lenni Road in our municipality of Middletown Township, Delaware County, during an Aqua excavation while installing a water main. The line was struck because Aqua and Energy Transfer Partners (ETP) failed to ascertain the location of the pipe. Despite the sensitive nature of the ME2 project, and both oral and written understandings that Middletown Township be provided with prompt notification of incidents occurring within the Township, Energy Transfer Partners never directly contacted the Township. Both our Municipal leadership and our residents find the happening of the accident and the failure to communicate to be utterly unacceptable.

The Middletown community has four (4) neighborhoods interrupted by HDD drill sites. There have been multiple reportable inadvertent returns requiring ongoing maintenance to prevent additional spills. DEP has shut down our HDD sites for numerous violations. Middletown Township deserves greater control and oversight by our leadership at the State.

The Middletown community has the right to expect excellence in every aspect of this installation. We have not received excellence. Instead, we have been confronted with lax oversight of an excavation site leading to contact between a backhoe and the ME2 pipe. We are fortunate that the pipe was not yet operative, but what if...?

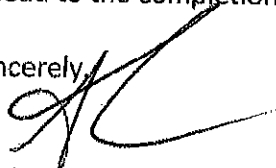
Middletown Township has no means to control how ETP chooses to install this line, but the PUC does. Under these circumstances, Middletown Township Council hereby requests that you

order a halt to the construction of the Mariner East 2 pipelines in Middletown Township until such time as the PUC has completed a thorough investigation of the accident involving Aqua, its contractors and ME2 and the construction practices that led to the incident. It is the Township's understanding that such an investigation is already underway. It is imperative that the investigation be conducted in a rigorous fashion, and that the results be communicated directly to the Township. Without such an investigation, the Township cannot provide assurances to its citizens that Mariner East is being installed in the safest possible fashion. The Township needs accurate information on the location of the pipeline within rights-of-way shared with other utilities, and must be guaranteed that all future excavation work in the vicinity of Mariner East will be conducted to the highest possible standards of safety.

Middletown Township Council is dedicated to protecting the health, safety, and welfare of all members of the community. Recent events have raised concerns that Energy Transfer Partners may be more focused on expedient construction than on citizen safety. If that is the case, it is intolerable. Our citizens are understandably alarmed. They are entitled to be assured that the governmental entities with jurisdiction over this project are requiring that ME2 is installed with the utmost care. They have a right to expect excellence in all aspects of the construction and maintenance of the pipelines.

Thank you for your consideration of our request. We look forward to your reply and we look ahead to the completion of your investigation.

Sincerely,



Andrew S. Haines
Township Manager

c: Township Council
James Flandreau, Esq.

COUNCIL MEMBERS

AT LARGE
NORMAN C. SHROPSHIRE
MARK KIRCHGASSER
SUSAN K. POWELL

FIRST DISTRICT
SCOTT D. GALLOWAY

SECOND DISTRICT
WALTER (BOB) READ

THIRD DISTRICT
RUSS CARLSON

FOURTH DISTRICT
STEPHEN BYRNE

TOWNSHIP OF MIDDLETOWN

DELAWARE COUNTY, PENNSYLVANIA

www.middleowntownship.org

27 N. PENNELL ROAD

P.O. BOX 157

LIMA, PA 19037-0157



610-565-2700

FAX 610-566-3640

MANAGER
ANDREW S. HAINES

ENGINEER
KELLY & CLOSE ENGINEERS

SOLICITOR
JOSEPH A. DAMICO, JR., ESQ.

Ms. Gladys M. Brown, Chairperson
Pennsylvania Public Utility Commission
400 North Street
3rd Floor, Room N-304
Harrisburg, PA 17120

RE: Township Council Support to Review Sunoco/ETP Public Awareness Program
Middletown Township, Delaware County

Dear Ms. Brown:

On behalf of the Middletown Township, Delaware County, Township Council, please accept this correspondence to support the efforts to review and ensure that the public awareness program required by Energy Transfer Partners ("ETP") is sufficient for the safety and wellbeing of our residents. Formal complaints have been filed to the PUC to this effect, and questions have been raised by our community of ETP's obligations with the ME2 natural gas liquid ("NGL") operations since the announced December 29, 2018 in-service notification.

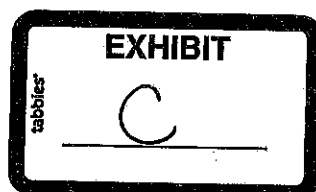
General guidance provided by ETP to assess and manage an incident related to an NGL leak or rupture has on many levels caused great concern or question to the notification systems, best practices for private residents or group homes to react, training protocols for first responders and an overarching trepidation due to the lack of proactive, quality education materials that is expected of ETP. Further, residents question the reliability of the workaround completed to have ME2 operational, by utilizing a mix of ME2 and ME2x, and existing pipes that were not originally designed to manage pressurized NGLs.

Middletown Township cannot emphasize more that the safest way to install a pipeline must be followed, to best try to ensure the health, safety and welfare of our residents. Anything less than the highest standard for safe installation and vigilant monitoring of the pipelines is not acceptable, and as noted above, a greater effort should be required of ETP to enhance communication and education to support those communities impacted by its operations.

Sincerely, on behalf of Middletown Township Council,

A handwritten signature in black ink, appearing to be "A. Haines", written over a white background.

Andrew S. Haines
Township Manager

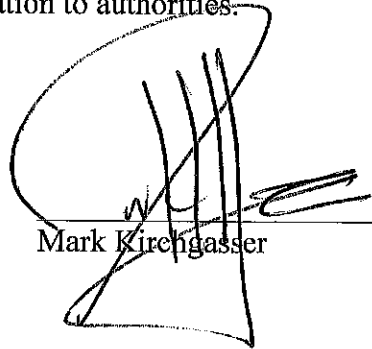


VERIFICATION

I, Mark Kirchgasser, am the Chairman of Township Council of Middletown Township. I hereby state that the facts set forth herein are true and correct to the best of my knowledge, information, and belief. I understand that the statements made herein are subject to the penalties of 18 Pa.C.S. §4904 concerning unsworn falsification to authorities.

Dated:

2-21-19



Mark Kirchgasser

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Megan Flynn, Rosemary Fuller :
Michael Walsh, Nancy Harkins :
Gerald McMullen, Caroline Hughes :
And Melissa Haines : Docket No. P-2018-3006117
 : Docket No. C-2018-3006116
v. :
 :
Sunoco Pipeline, L.P. :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing Petition to Intervene upon parties of record in this proceeding in accordance with the requirements of 52 Pa.Code §1.54 (relating to service by a participant), in the manner and upon the persons listed below:

SERVICE BY FIRST CLASS MAIL

Michael Bomstein, Esquire
Pinnola & Bomstein
Suite 2126 Land Title Building
100 South Broad Street
Philadelphia, PA 19110

Curtis Stambaugh, Esquire
Assistant General Counsel
Sunoco Pipeline LP
212 N. Third Street, Suite 201
Harrisburg, PA 17101

Thomas J. Sniscak, Esquire
Kevin J. McKeon, Esquire
Whitney E. Snyder, Esquire
Hawke, McKeon & Sniscak LLP
100 North Tenth Street
Harrisburg, PA 17101
tjsniscak@hmslegal.com
kjmckeon@hmslegal.com
wesnyder@hmslegal.com

Robert Fox, Esquire
Neil Witkes, Esquire
Diana A. Silva, Esquire
Manko, Gold, Katcher & Fox LLP
401 City Avenue, Suite 901
Bala Cynwyd, PA 19004
rfox@mankogold.com
nwitkes@mankogold.com
dsilva@mankogold.com

Rich Raiders, Esquire
Raiders Law
606 North 5th Street
Reading, PA 19601
rich@raiderslaw.com

Vincent M. Pompo, Esquire
Alex J. Baumler, Esquire
Lamb McErlane PC
24 East Market St., Box 565
West Chester, PA 19382-0565
vpompo@lambmcerlane.com
abaumler@lambmcerlane.com

Anthony D. Kanagy, Esquire
Garrett P. Lent, Esquire
Post & Schell PC
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
akanagy@postschell.com
glent@postschell.com

Margaret A. Morris, Esquire
Reger Rizzo & Darnall, LLP
Cira Centre, 13th Floor
2929 Arch Street
Philadelphia, PA 19104
mmorris@regerlaw.com

Leah Rotenberg, Esquire
Mays Connard & Rotenberg, LLP
1235 Penn Avenue, Suite 202
Wyomissing, PA 19610
Rotenberg@mcr-attorneys.com

Mark L. Freed, Esquire
Joanna A. Waldron, Esquire
Curtin & Heefner LLP
2005 South Easton Road, Suite 100
Doylestown, PA 18901
mlf@curtinheefner.com
jaw@curtinheefner.com