



Thomas J. Sniscak
(717) 703-0800
tjsniscak@hmslegal.com

Kevin J. McKeon
(717) 703-0801
kjmckeon@hmslegal.com

Whitney E. Snyder
(717) 703-0807
wesnyder@hmslegal.com

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 www.hmslegal.com

March 13, 2019

VIA ELECTRONIC FILING

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

Re: Meghan Flynn, et al. v. Sunoco Pipeline L.P.; Docket Nos. C-2018-3006116
and P-2018-3006117; **SUNOCO PIPELINE L.P.'S ANSWER
OPPOSING INTERVENTION OF MIDDLETOWN TOWNSHIP**

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission is Sunoco Pipeline L.P.'s Answer Opposing Intervention of Middletown Township in the above-referenced proceeding.

If you have any questions regarding this filing, please contact the undersigned.

Very truly yours,

Thomas J. Sniscak
Kevin J. McKeon
Whitney E. Snyder
Counsel for Sunoco Pipeline L.P.

WES/das
Enclosure

cc: James J. Byrne, Esquire
Kelly S. Sullivan, Esquire
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MEGHAN FLYNN	:		
ROSEMARY FULLER	:		
MICHAEL WALSH	:		
NANCY HARKINS	:		
GERALD MCMULLEN	:		
CAROLINE HUGHES and	:		
MELISSA HAINES	:		
	:	Docket Nos.	C-2018-3006116
Complainants,	:		P-2018-3006117
	:		
v.	:		
	:		
SUNOCO PIPELINE L.P.,	:		
	:		
Respondent.	:		

**SUNOCO PIPELINE L.P.’S ANSWER OPPOSING
INTERVENTION OF MIDDLETOWN TOWNSHIP¹**

Pursuant to 52 Pa. Code § 5.66,² Sunoco Pipeline L.P. (SPLP) submits this Answer Opposing Middletown Township’s February 21, 2019 Petition to Intervene in this proceeding because the Petition is untimely and Middletown Township has not shown its interests are not adequately represented.

1. On November 19, 2018 Complainants filed the Complaint and Petition.
2. On December 20, 2018 Complainants filed an Amended Complaint.
3. Middletown Township filed a Petition to Intervene on February 21, 2019.

¹ While this petition was granted without providing SPLP the opportunity to respond, SPLP is filing its Answer in Opposition to preserve its rights.

² SPLP notes that it is not required to specifically answer the allegations within a Petition to Intervene, and any such allegations are not deemed admitted by SPLP’s non-response. Compare 52 Pa. Code § 5.66 (“party may file an answer to a Petition to Intervene within 20 days of service, and in default thereof, may be deemed to have waived objection to the granting of the petition. Answers shall be served upon all other parties.”) with § 5.61(b)(3) (as to form of answers to complaints, answers must “Admit or deny specifically all material allegations of the complaint”).

4. Middletown Township's Petition is untimely. It was filed 94 days after the Complaint.

5. Middletown Township does not allege its Petition was timely filed.

6. 52 Pa. Code §§ 5.74 and 5.53 require a Petition to Intervene in a proceeding be filed within 60 days of the initiating pleading in a proceeding, absent "good cause shown."

7. Middletown Township's Petition was untimely because it was filed 94 days after the Complaint and Middletown Township has not averred good cause for allowing untimely intervention.

8. The December 20, 2018 amendments to the Complaint did not extend the time for interventions. Even if there was a Commission regulation that extended the time for intervention based on an amendment to a pleading, which there is not, SPLP notes that Middletown Township's Petition to Intervene would still be untimely, as it was filed 63 days after the Amended Complaint was filed. There is no Commission regulation that extends the time for intervention when an amendment to a pleading is filed. A Petition to Intervene is due 60 days from an initiating complaint. 52 Pa. Code §§ 5.74 and 5.53.

9. In contrast, the Commission's regulations expressly extend the answering time period when an amended pleading is filed to require an answer within 20 days of the amended pleading. 52 Pa. Code § 5.65(a). The presence of a specific Commission regulation that extends the time for an answer in the event of an amended pleading coupled with the absence of any Commission regulation regarding intervention and amended pleadings means that the Commission has not changed the time period for intervention in the event of an amended pleading. *See, e.g., Popowsky v. Pennsylvania Public Utility Com'n*, 869 A.2d 1144, 1159 (Pa. Cmwlth. 2005) (the inclusion of a specific matter in a statute implies the exclusion of other matters).

10. To allow untimely intervention, the Petition to Intervene must show good cause. 52 Pa. Code § 5.74.

11. Middletown Township fails to even allege good cause for allowing it to intervene out of time in this proceeding. There is no good cause to allow Middletown Township to intervene out of time and its Petition should be denied.

12. Moreover, Middletown Township knew about the Complaint and the 60-day deadline to file a letter or Petition to Intervene pursuant to 52 Pa. Code §§ 5.74 and 5.53. Middletown Township discussed the Complaint filed by the “Safety Seven” at the January 14, 2019 Regular Meeting of Middletown Township’s Council. A copy of the meeting minutes is attached as Attachment A. The “Safety Seven” refers to the Complainants in this case. As reflected in Attachment A, the Complainants, namely Ms. Rosemary Fuller, approached the Township for a letter of support regarding their Complaint. The discussion between the Township Chairman, Mr. Mark Kirchgasser, and the Township Manager, Mr. Andrew Haines, affirmed this meeting and set out the deadline for filing a petition as reflected below:

“Mr. Haines stated he met with Ms. Fuller and the Township was aware a request to support a specific complaint or provide a letter of support to the PUC. Mr. Kirchgasser asked when the deadline is. Mr. Haines stated the deadline to file a letter is January 16, 2019.”

See Attachment A, Pages 1-2 (Emphasis added). Therefore, Middletown Township knew about, considered, yet actively chose not to file their Petition to Intervene within the 60-day period described in 52 Pa. Code §§ 5.74 and 5.53, which they had explicit knowledge of as reflected above. Middletown Township’s Petition to Intervene should be denied in light of their interaction with, and explicit recognition of, the Commission’s regulations governing the filing of a Petition to Intervene.

13. Middletown Township's Petition to Intervene should also be denied because it has failed to show that its interests are not already adequately represented in this proceeding. 52 Pa. Code § 5.72 (a)(2); *see generally* Petition to Intervene.

14. Indeed, Middletown Township merely states its interest "... cannot be, adequately represented by any other party." Petition to Intervene at ¶ 16. However, 52 Pa. Code § 5.72(a)(2) expressly provides that to intervene, petitioner must possess "an interest which may be directly affected **and which is not adequately represented by existing participants.**" *Id.* (emphasis added). Middletown Township has not provided any reason or support for the notion that their interests are not adequately represented by existing participants. Accordingly, Middletown Township's Petition to Intervene should be denied on this basis as well.

15. SPLP notes that if Middletown Township is nonetheless granted intervenor status, late filed intervenors must take the case as it is and cannot expand the scope of the proceeding. *See Com., et al. v. Energy Services Providers, Inc. d/b/a PaG&E, Order Granting Petition to Intervene*, Docket No. C-2014-2427656, 2015 WL 1957859 (Order entered Apr. 23, 2015) (Cheskis, J.) ("In granting intervention, however, Mr. Sobiech will be required to take the case as it currently stands. PaG&E is correct that intervenors generally take the record as they find it at the time of intervention."). Even if intervention is allowed, Middletown Township cannot pursue issues beyond the scope of the Amended Complaint.

WHEREFORE Sunoco Pipeline L.P. respectfully requests Middletown Township's
Petition to Intervene be denied.

Respectfully submitted,

Thomas J. Sniscak

Thomas J. Sniscak, Attorney I.D. # 33891
Kevin J. McKeon, Attorney I.D. # 30428
Whitney E. Snyder, Attorney I.D. # 316625
Hawke McKeon & Sniscak, LLP
100 North Tenth Street
Harrisburg, PA 17101
(717) 236-1300
tjsniscak@hmslegal.com
kjmckeon@hmslegal.com
wesnyder@hmslegal.com

/s/ Robert D. Fox

Robert D. Fox, Esq. (PA ID No. 44322)
Neil S. Witkes, Esq. (PA ID No. 37653)
Diana A. Silva, Esq. (PA ID No. 311083)
MANKO GOLD KATCHER & FOX, LLP
401 City Avenue, Suite 901
Bala Cynwyd, PA 19004
Tel: (484) 430 5700
rfox@mankogold.com
nwitkes@mankogold.com
dsilva@mankogold.com

Dated: March 13, 2019

Attorneys for Respondent Sunoco Pipeline L.P.

ATTACHMENT A

MIDDLETOWN TOWNSHIP
DELAWARE COUNTY, PENNSYLVANIA
JANUARY 14, 2019

Minutes of the Regular Meeting of Township Council held on January 14, 2019 at 7:00 P.M. in the Township Administration Building located at 27 North Pennell Road.

Present: Stephen Byrne, Scott Galloway, Mark Kirchgasser, Susan Powell, Walter 'Bok' Read, Andrew Haines, Joseph Damico, Jr., Esq., Eric Janetka

Absent: Russ Carlson, Norman Shropshire

1. OPENING

Chairman Mark Kirchgasser called the meeting of the Council to order at 7:08p.m. and led recitation of the Pledge of Allegiance to the Flag.

Mr. Kirchgasser stated Council met in Executive Session to discuss legal issues on agenda item 7C asbestos RFP bids at Roosevelt School.

2. APPROVAL OF MINUTES - N/A

3. COMMENTS FROM THE PUBLIC

Ms. Becky Barner, Lima Estates, stated she has a petition signed by Lima Estates residents requesting Middletown Township Council to video broadcast recorded and made easily available on the Township website. Mr. Kirchgasser stated this item can be brought before Council at a future meeting.

Ms. Joanne Williams, 108 Judith Lane, stated she understands that on New Year's weekend, the pipelines were up and running. She asked with the government closed if there was an inspection. Mr. Kirchgasser stated there is no report provided to confirm that inspections were done. Ms. Williams asked if the Township was notified. Mr. Kirchgasser stated he received a direct e-mail from a communication consultant from Energy Transfer Partners. He stated he immediately posted the information on social media, notified Township Council, Township Engineer, Township Manager, State Police and the Chiefs of the two Township Volunteer Fire Companies. Ms. Williams asked why the residents were not notified. She asked if there is a plan in place for evacuation and is it on the website. Mr. Kirchgasser stated the response plan in place is not to be published publicly because of safety concerns. Ms. Williams asked how the citizens are going to know what to do. Mr. Kirchgasser stated the Emergency Management Team will direct the public. Ms. Williams stated if there is a rupture or leak, the residents cannot be notified by cell phones. Mr. Kirchgasser stated according to the counsel from the Emergency Management Coordinator and a direct result from the lawsuit by the "Safety Seven", residents should proceed to an area upwind and uphill.

Ms. Bibbiana Dussling, 76 War Admiral Lane, regarding the "Safety Seven", the hearing is Thursday, January 17, 2019. She stated some of the members of the case have approached the Township for a letter of support. Mr. Haines stated he met with Ms. Fuller and the Township was aware a request to support a specific complaint or provide a letter of support to the PUC.

Mr. Kirchgasser asked when the deadline is. Mr. Haines stated the deadline to file a letter is January 16, 2019. Ms. Dussling stated individual residents can write letters showing how they are affected. She stated this is a good opportunity for the Township to state how the Township is directly affected and offer support for the residents.

4. REPORTS

A. CHAIRMAN

Mr. Kirchgasser stated the highway crews did an excellent job and wanted to thank the crew with the recent wintry weather event. He stated there were no accidents reported from either fire company.

B. COMMITTEE - N/A

C. MANAGER

1) Consideration to Amend Bidding Threshold Values to 2019 Levels.

Mr. Haines noted the State updated the bidding threshold for purchases based on consumer price index. This includes getting quotes, obtaining written quotes, or going out to bid. He stated the threshold values are \$11,100 or \$20,600. He stated the Township codified the threshold specifically at \$18,500. Mr. Haines asked if Council was receptive to amending Code to update and aligned with current State statutes, and Council provided consensus support for such an amendment.

2) Consent to Authorize Advertisement and Accept Online Sale of Township Excess and Unneeded Personal Property.

Mr. Haines stated for public the record, there are several old telephones and a very old shredder that staff would like to put on Municibid for sale. He stated he plans to bring forth an ordinance for Council's consideration to modernize the section of Township Code that has not been changed since 1978. Mr. Haines asked if Council has any objection to sell the items on Municibid and Code amendment and received support to both.

D. ENGINEER - N/A

5. OLD BUSINESS

Continued Conditional Use Hearing from December 10, 2018 - See Agenda Item 6A.

Mr. Galloway stated there has been a request from the attorney for the applicant, Linvilla Orchards, to continue the agenda item and have requested it be placed on the agenda for Monday, January 28, 2019.

Mr. Galloway made a motion to continue the agenda item and Mr. Byrne seconded the motion. The motion carried with a vote of 5-0.

6. PUBLIC HEARING

- A. Continued from 11/22/2018 and 12/10/2018: A public hearing on a Conditional Use for Linvilla Orchards, 137 W. Knowlton Road, consideration to amend the June 8, 1992 Agreement for non-conforming uses and accessory uses, as identified in Exhibit "B" of the agreement, to permit the commercial dispensing and/or retail sale of malted or brewed alcoholic beverages.

Continued to the January 28, 2019 Council Meeting.

- B. Public hearing on a Conditional Use for Dos Gringos, 415 Lenni Road, consideration for commercial food production facility.

Mr. Galloway made a motion to open the Public Hearing and Mrs. Powell seconded the motion. The motion carried with a vote of 5-0.

SEE ATTACHED HEARING MINUTES

Mr. Galloway made a motion to close the Public Hearing and Mrs. Powell seconded the motion. The motion carried with a vote of 5-0.

Mr. Galloway made a motion to amend the agenda to vote on a resolution for a conditional use and Mrs. Powell seconded the motion. The motion carried with a vote of 5-0.

7. NEW BUSINESS

- A-1. Consideration to Approve Conditional Use for Dos Gringo, 415 Lenni Road, for commercial food production facility.

Mr. Read made a motion to approve the Conditional Use and Mr. Byrne seconded the motion. The motion carried with a vote of 5-0.

6. PUBLIC HEARING

- C. A Public Hearing on a Conditional Use for Granite Run Buick GMC, for property located at 1067 W. Baltimore Pike (Sears Automotive), consideration for temporary vehicle parking/storage. To be continued to March 25, 2019.

Mr. Galloway made a motion to continue the Public Hearing to the March 25, 2019 Council Meeting and Mrs. Powell seconded the motion. The motion carried with a vote of 5-0.

D. NEW BUSINESS

- A. Consideration to introduce Ordinance No. 800: Amendments to Chapter 4 - Administration of Government and the creation of a Middletown Township Personnel Manual.

Mr. Galloway stated he would like more time to review the proposed the ordinance and would like more time to review some aspects.

Mr. Galloway made a motion to continue the agenda item to the January 28, 2019 Council Meeting and Mrs. Powell seconded the motion. The motion carried with a vote of 5-0.

B. Council Review of Zoning Hearing Board application: Application 19-01: Anthony & Sylvan Pools on behalf of Jordan Grant - 342 Valley Road.

Mr. Haines stated the homeowner spoke to Ms. Merino prior to settlement and is looking for relief of the rear yard setback and feel there are conditions that highlight why this is the only location to place the pool. He stated because of the potential for pools to push stormwater onto adjacent properties, staff believes there should be screening along the property line and some significant onsite stormwater management to address the potential impact. Mr. Kirchgasser asked if staff will be present at the meeting and asked if legal representation will be needed and Mr. Galloway stated he feels staff will be sufficient. Mr. Haines stated Mr. Janetka will represent the Township due to the stormwater issues.

C. Consideration to Award Contract for RFP: Asbestos Removal at Roosevelt School- West Wing.

Mr. Haines stated the Township partnered with Criterion Labs for the RFP asbestos remediation at Roosevelt School. He stated there were multiple pre-bid walk-throughs and three addendums that were provided to the bidders. He stated ten bids were submitted to the Township that were opened publicly, but four of the ten bids submitted in a way that misunderstood the intent of how cost was to be presented. Mr. Haines stated he worked with Mr. Damico to provide administrative clarification; however, this created further complication on submitted values. Mr. Haines stated it is staff's opinion there is confusion that could lead to a potential appeal in the awarding of the bid. He stated it is staff's recommendation to reject all bids and immediately re-bid.

Mr. Galloway made a motion to reject all bids and re-advertise for new bids and Mrs. Powell seconded the motion. The motion carried with a vote of 5-0.

D. Consideration for Authorization - Highway Occupancy Permit Condition Statement, WV-PP Towne Center Multi-Use Trail - Permit Application #167072.

Mr. Stephen Polaha stated this condition statement relates to a piece of the multi-use trail that runs from Road A, across from Valley Road to the SEPTA Train Station property. He stated very little is in the PADOT right-of-way, but still requires a Condition Statement.

Ms. Kelly Johnson, 711 Iris Lane, asked what the trail is and what it connects with. Mr. Polaha provided her with a plan of the trail. Mr. Kirchgasser stated this is the Township's extension of the Chester Creek Trail from the Wawa Train Station. He stated the terminus is at Rt. 452 where the planned Printers Way traffic-controlled intersection will be at Rt. 452 (loop road).

Mr. Galloway made a motion to authorize the Highway Occupancy Permit Condition Statement and Mrs. Powell seconded the motion. The motion carried with a vote of 5-0.

E. Consideration to Authorize - Traffic Signal Agreement for Road "A" in association with WV-PP Towne Center, located at 1408 W. Baltimore Pike, Folio #27-00-00100-01

Mr. Polaha stated Road "A" is the entrance driveway to the residential project across from Valley Road. He stated this agreement would provide the Township with an easement for the traffic signal facilities that WV-PP will be installing at the intersection. He stated this is the same easement agreement that was provided to Council with respect to the easement at Granite Farms Estates. Mr. Polaha stated there is also as per the agenda, a Traffic Signal

Easement Agreement at Office Drive next to the PA. State Police Barracks. Mr. Haines stated Mr. McKenna and Mr. Matson reviewed to make sure the metes and bounds are consistent with what Mr. Polaha has provided and approve of the submitted documents.

Mr. Galloway made a motion to approve the Traffic Signal Easement Agreement and Mr. Byrne seconded the motion. The motion carried with a vote of 5-0.

- F. Consideration to Authorize - Traffic Signal Agreement at PA State Police Barracks, in association with WV-PP Towne Center, located at 1336 and 1408 W. Baltimore Pike, Folio #27-00-00100-01 and #27-00-00096-00.

Mr. Galloway made a motion to authorize the Traffic Signal Agreement at the PA State Police Barracks. Mr. Read seconded the motion. The motion carried with a vote of 5-0.

- G. Consideration to Authorize - Stormwater Operation and Maintenance Agreement, in association with WV-PP Towne Center, Road "A".

Mr. Haines stated the documents show this is specific for the stormwater operation and maintenance at Donovan Drive and has been reviewed by Mr. McKenna and Mr. Matson. Mr. Polaha stated the agreement provides for the developer WV-PP, to maintain the stormwater facilities at Donovan Drive where it intersects Baltimore Pike. Mr. Kirchgasser stated Donovan Drive intersects at Thomas Chevrolet.

Mr. Galloway made a motion to authorize the Agreement and Mrs. Powell seconded the motion. The motion carried with a vote of 5-0.

- H. Consideration for Approval - Resolution 2019-20; Final Major Subdivision, "Darlington Pointe II," 432 Old Forge Road.

Mr. James Buckley, representing the developer, stated they are looking for approval of the subdivision consisting of eight lots (7 new building lots). He stated two lots access by their own individual driveways by Old Forge Road (Lots 1 and 2), and Lots 5,6, 7 and 8 access by Old Forge Road by a common driveway, and Lots 3 and 4 access by Matrissa Ridge through a shared driveway. He stated the plan has been reviewed and they comply with all the requests and comments. He stated he is requesting two waivers: to allow for certain construction in steep and very steep slope areas and the requirement plans be signed and sealed by a landscape architect. He stated there is very minimal landscaping and what is provided is for screening purposes.

Mrs. Powell asked if Eric Janetka is satisfied with the stormwater management of the plan and he the stormwater that flows down Forge Road has been addressed. Mr. Kirchgasser asked if there is an estimate when Darlington Pointe I will be completed, and he said it is his client's intention to put the sewer laterals in and then complete the road and have it dedicated.

Mr. Galloway made a motion to approve the Resolution and Mr. Read seconded the motion. Resolution 2019-19 carried with a vote of 4-0. Mr. Kirchgasser abstained from the vote.

I. Consideration for Approval - Resolution 2019-20; Preliminary Major Subdivision Plan of Bonaventure Builders, known as "Elms at Lenni," 312 Lenni Road.

Mr. Adam Powell, Civil Engineer for the project and the application is the existing area of the Lenni Fire House. He stated the idea is to demolish everything to build a 6-lot development. He stated 5 lots will be on Elm Avenue and one lot on Lenni Road.

Mr. Powell stated he received Mr. Janetka's review letter from the Engineer in October and did a walk of the property. He stated the Planning Commission recommended approval. He stated the applicant agreed to do soil testing on the property. He stated there will be some soil remediation to be done. He stated per Township Codes, because they are removing so much asphalt, they meet the stormwater regulations without the underwater infiltration beds. He stated the applicant has agreed, if needed, to provide infiltration beds. Mr. Powell stated there are existing inlets on the site which will be repurposed. He stated zoning relief was required for a reverse frontage lot which requires a minimum rear yard setback of 60 feet. He stated they received approval to reduce the rear yard setback to 47 feet. He stated they will provide the buffer requirements required by having an evergreen row on the edge of Lot 1. Mr. Powell stated he has reviewed and agreed to the Kelly & Close comment letter and the Tom Comitta letter. He stated they will need a waiver to cover the rear yard setback. He stated they will need a waiver of the 60-foot right-of-way on Lenni Road. He stated the existing right-of-way is 33 feet. He stated this would put them 13 feet into the lots. He stated Lenni Road is a State Road. Mr. Powell stated the agreement with the Township is to provide an 8-foot wide utility easement which will allow the Township or PennDOT to come onto the property to maintain any utilities. He stated the house on Lot 6 will be moved an additional 5 feet off the right-of-way.

Mr. Kirchgasser stated the property is the former Lenni Heights Fire Company and prior applications proposed light industrial use that was not supported. Mr. Chris Garriga, 416 Meadowhurst Lane, asked how big the lots and the houses will be. Mr. Powell stated the homes will be approximately 1800 square feet and are two story homes with two car garages. Mr. Powell stated all the lot sizes are over 1/4 acre.

Mr. Galloway made a motion to approve the Resolution and Mr. Byrne seconded the motion. Resolution 2019-20 carried with a vote of 5-0.

Mr. Kirchgasser adjourned the meeting at 8:10 P. M.

Respectfully Submitted,


Sharon Browne, Recorder

CERTIFICATE OF SERVICE

Docket Nos. C-2018-3006116 and P-2018-3006117

I hereby certify that I have this day served a true copy of the forgoing document upon the parties, listed below, in accordance with the requirements of § 1.54 (relating to service by a party). This document has been filed electronically on the Commission's electronic filing system and served on the following:

VIA ELECTRONIC AND FIRST CLASS MAIL

Michael S. Bomstein, Esquire
Pinnola & Bomstein
Suite 2126 Land Title Building
100 South Broad Street
Philadelphia, PA 19110
mbomstein@gmail.com

Counsel for Complainants

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

Counsel for Range Resources – Appalachia LLC

Guy A. Donatelli, Esquire
Lamb McErlane, PC
24 East Market St., Box 565
West Chester, PA 19382-0565
gdonatelli@lambmcerlane.com

Counsel for Downingtown Area School District, Chester County, Pennsylvania and Rose Tree Media School District, Delaware County, Pennsylvania

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

Counsel for West Whiteland Township, Chester County, Pennsylvania

Rich Raiders, Esquire
Raiders Law
321 East Main Street
Annville, PA 17003
rich@raiderslaw.com

Counsel for Andover Homeowner's Association, Inc.

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

Counsel for East Goshen Township

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

Counsel for Twin Valley School District, Berks County, Pennsylvania

James R. Flandreau, Esquire
Paul, Flandreau & Berger, LLP
320 W. Front Street
Media, PA 19063
jflandreau@pfblaw.com

Counsel for Middletown Township

Certificate of Service

Page 2

Docket Nos. C-2018-3006116 and P-2018-3006117

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

*Counsel for Downingtown Area School District,
Chester County, Pennsylvania, Rose Tree Media
School District, Delaware County,
Pennsylvania, and West Whiteland Township*

Mark L. Freed
Curtin & Heefner LP
2005 S. Easton Road, Suite 100
Doylestown, PA 18901
mlf@curtinheefner.com

Counsel for Uwchlan Township

Michael Maddren, Esquire
Patricia Sons Biswanger, Esquire
Office of the Solicitor
County of Delaware
Government Center Building
201 West Front Street
Media, PA 19063
MaddrenM@co.delaware.pa.us
patbiswanger@gmail.com

Counsel for County of Delaware

James C. Dalton, Esquire
Unruh Turner Burke & Frees
P.O. Box 515
West Chester, PA 19381-0515
jdalton@utbf.com

*Counsel for West Chester Area School District,
Chester County, Pennsylvania*



Thomas J. Sniscak, Esq.
Kevin J. McKeon, Esq.
Whitney E. Snyder, Esq.

Dated: March 13, 2019