

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

NORMA CHASE,	:	
	:	
Plaintiff	:	
	:	No. 1:05-CV-2375
v.	:	
	:	Judge Kane
PUBLIC UTILITY COMMISSION	:	
OF PENNSYLVANIA,	:	Document Electronically Filed
COMMONWEALTH REPORTING	:	
COMPANY, SARGENT’S COURT	:	
REPORTING SERVICE, INC., and	:	
PRECISION REPORTING, INC.,	:	
Defendants	:	

ANSWER

Defendants, by their attorney, submit the following answer to the complaint.

FIRST DEFENSE

The numbered allegations of the complaint are answered as follows:

1. This numbered paragraph is an introductory statement to which NO RESPONSE is required. To the extent it is deemed factual, it is DENIED.

2. This numbered paragraph is an introductory statement to which NO RESPONSE is required. To the extent it is deemed factual, it is DENIED.

3. This numbered paragraph is an introductory statement to which NO RESPONSE is required. To the extent it is deemed factual, it is DENIED.

4. ADMITTED.

5. This numbered paragraph is an introductory statement to which NO RESPONSE is required. To the extent it is deemed factual, it is DENIED.

6. This numbered paragraph is a statement of jurisdiction to which NO RESPONSE is required. To the extent it is deemed factual, it is DENIED.

7. ADMITTED.

8. ADMITTED.

9. ADMITTED.

10. ADMITTED.

11. ADMITTED.

12. ADMITTED.

13. ADMITTED.

14. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 14 to be able to admit to them and accordingly, they are **DENIED**.

15. ADMITTED.

16. ADMITTED.

17. ADMITTED.

18. ADMITTED.

19. ADMITTED.

20. This numbered paragraph contains conclusions of law to which NO RESPONSE is required. To the extent they are deemed factual, they are DENIED.

21. This numbered paragraph contains conclusions of law to which NO RESPONSE is required. To the extent they are deemed factual, they are DENIED.

22. This numbered paragraph contains conclusions of law to which NO RESPONSE is required. To the extent they are deemed factual, they are DENIED.

23. This numbered paragraph is a statement of a claim under the First Amendment to which NO RESPONSE is required. To the extent it is deemed factual, it is DENIED.

24. This numbered paragraph contains conclusions of law to which NO RESPONSE is required. To the extent they are deemed factual, they are DENIED.

25. This numbered paragraph contains conclusions of law to which NO RESPONSE is required. To the extent they are deemed factual, they are DENIED.

26. This numbered paragraph contains conclusions of law and requests for relief to which NO RESPONSE is required. To the extent they are deemed factual, they are DENIED.

27. This numbered paragraph contains requests for relief to which NO RESPONSE is required. To the extent they are deemed factual, they are DENIED.

SECOND DEFENSE

The complaint fails to state a claim upon which relief may be granted.

THIRD DEFENSE

At no time have defendants, either individually or in concert with others, deprived or sought to deprive plaintiff of any rights, privileges or immunities secured to her by the Constitution or laws of the United States.

FOURTH DEFENSE

Plaintiff is not entitled to the award of costs of suit and counsel fees.

WHEREFORE, judgment should be entered in favor of defendants.

Respectfully submitted,

THOMAS W. CORBETT, JR.
Attorney General

By: *s/John G. French*

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Chief, Civil Litigation Section

Date: December 29, 2006

Counsel for Defendants