

FILE COPY

VIA HAND DELIVERY

December 18, 2017

Office of the Director
Allegheny County Health Department
542 4th Avenue
Pittsburgh, PA 15219

**Re: In Re: Meyers Management Company
Petition for Stay of Proceedings**

To Whom It May Concern:

Enclosed please find a Petition for Stay of Proceedings relative to the Enforcement Order dated November 22, 2017, which is being filed on behalf of the Appellant, Meyers Management Company.

Your consideration is appreciated.

Very truly yours,

TUCKER ARENSBERG, P.C.



Gavin A. Robb

GAR/kc
Enclosure

c: Jason Willis, Esquire, Asst. Solicitor, Allegheny County Health Department (w/ encl.)

LIT:632675-1 020959-180475

RECEIVED DEC 18 2017

BEFORE THE ALLEGHENY COUNTY HEALTH DEPARTMENT
542 4th AVENUE
PITTSBURGH, PENNSYLVANIA, 15219

In the Matter of: MEYERS MANAGEMENT COMPANY
1823 Penn Avenue
Pittsburgh, PA 15221

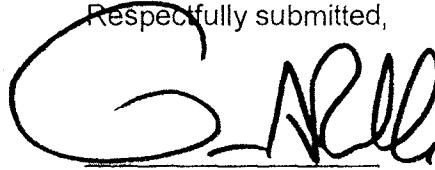
PETITION FOR STAY

Appellant, Meyers Management Company, Inc. ("Meyers"), by and through its attorneys, Tucker Arensberg, P.C., respectfully submits this Petition for Stay of the Enforcement Order dated November 22, 2017 ("Order"), pursuant to Section 1111 of the Rules and Regulations ("Rules") of the Allegheny County Health Department ("ACHD"), and avers as follows:

1. Meyers is a Pennsylvania corporation with its principal business address located at 1823 Penn Avenue, Pittsburgh, PA 15221.
2. ACHD has issued a civil penalty against Meyers in the amount of \$106,675.00 for alleged violations of the Rules.
3. Meyers anticipates holding substantive settlement discussions with the ACHD in the immediate future and expects to reach an amicable resolution of this matter without the need for a hearing.
4. Accordingly, Meyers hereby files the within Petition for Stay and respectfully requests that its obligation to submit payment in full of the civil penalty in the amount of \$106,675.00 be stayed until such time as the parties have either resolved the matter or upon decision of the hearing officer if no settlement is reached.

5. Meyers respectfully submits that granting of the stay will not prejudice any party hereto and will not affect the likelihood of injury to the public or other parties.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "G. All" or similar, written over a horizontal line.

Irving S. Firman, Esq.
Gavin A. Robb, Esq.

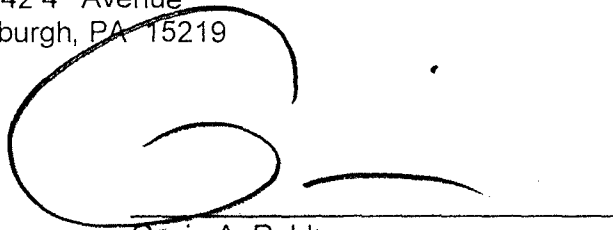
TUCKER ARENSBERG, P.C.
1500 One PPG Place
Pittsburgh, PA 15222
(412) 566-1212

Counsel for the Petitioner,
Meyers Management Company

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Petition for Stay of Proceedings has been served on the party listed below via hand delivery, on the 18th day of December, 2017:

Office of the Director
Allegheny County Health Department
542 4th Avenue
Pittsburgh, PA 15219

A handwritten signature in black ink, appearing to be 'Gavin A. Robb', is written over a horizontal line. The signature is stylized with a large, looping initial 'G'.

Gavin A. Robb