

**Erik R. Steinheiser**  
P.O. Box 7008  
Pennel, Pa 19047

**Commonwealth Court of Pennsylvania**  
Office of the Clerk  
Suite 2100  
P.O. Box 69185  
Harrisburg, Pa 17106-9185

RE: Case Briefing  
Case No. 1255 CD 2022.

To whom it may concern,

I am in receipt of SEPTA's filings and I would like to file this simple statement as my brief. My brief simply forms around the fact that the burden on proof is on SEPTA and not on myself. SEPTA is alleging that they cannot comply with the most recent OOR order because it is "too expensive for them", however this is not how the RTKL works. There is a specific fee structure in place stating the limits of fees that can be imposed on the requestor. The amount that they are trying to collect is well beyond that limit and is SEPTA's responsibility to pay if they choose to redact the record. You will clearly see this in both the filings and the certified record provided by the OOR. In addition to this as you are likely aware there is plenty of case law to support this. Remember this is SEPTA's action and not mine and they bear full expense and responsibility to bear this burden.

For these simple reasons alone, I direct the court to uphold and support the OOR's ruling on this and order SEPTA to provide the redacted records at their expense. In the alternative, I direct that the court orders SEPTA to release the record to me as this is an exemption under the RTKL and not the actual law. I thank you for your time.

Regards,

e/s Erik R. Steinheiser

**Erik R. Steinheiser**