

17 North Second Street 12th Floor Harrisburg, PA 17101-1601 717-731-1970 Main 717-731-1985 Main Fax www.postschell.com

Michael W. Gang

mgang@postschell.com 717-612-6026 Direct 717-731-1985 Direct Fax File #: 161198

January 13, 2015

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2nd Floor North P.O. Box 3265 Harrisburg, PA 17105-3265

Re: Pennsylvania Public Utility Commission, Bureau of Investigation and Enforcement v. Lyft, Inc. Docket No. C-2014-2422713

Dear Secretary Chiavetta:

Enclosed for filing on behalf of Lyft, Inc., is the Unopposed Motion for Continuance of the February 19, 2015 Initial Hearing, in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

R/espectfully submitted, Michael W. Gang

MWG/jl Enclosures

cc: Certificate of Service Honorable Mary D. Long Honorable Jeffrey Watson

CERTIFICATE OF SERVICE

(Docket No. C-2014-2422713)

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL & FIRST CLASS MAIL

Michael L. Swindler, Esquire Stephanie M. Wimer, Esquire Wayne T. Scott, Esquire Bureau of Investigation and Enforcement Commonwealth Keystone Building 400 North Street, 2nd Floor West PO Box 3265 Harrisburg, PA 17105-3265 Email: mswindler@pa.gov stwimer@pa.gov wascott@pa.gov Richard P. Sobiecki, Esquire Andrew T. George, Esquire Baker Botts L.L.P. 1299 Pennsylvania Avenue NW Washington, D.C. 20004 Email: rich.sobiecki@bakerbotts.com andrew.george@bakerbotts.com

Danny David, Esquire Baker Botts L.L.P. 910 Louisiana Street Houston, TX 77002 Email: danny.david@bakerbotts.com

Date: January 13, 2015

Michael W. Gang

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY	:	
COMMISSION, BUREAU OF	:	
INVESTIGATION AND ENFORCEMENT	:	
	:	
Complainant,	:	
	:	Docket No. C-2014-2422713
V.	:	
	:	
LYFT, INC.	:	
	:	
Respondent.	:	
_		

LYFT'S UNOPPOSED MOTION FOR CONTINUANCE OF FEBRUARY 19, 2015 INITIAL HEARING

1. Pursuant to 52 Pa. Code § 1.15(b), and for good cause shown, Lyft, Inc. respectfully requests that the Initial Hearing scheduled for February 19, 2015, in the above-captioned matter be continued.

2. Lyft has conferred with the Bureau of Investigation and Enforcement ("I&E") regarding the Motion for Continuance, and I&E does not oppose the requested relief, which seeks to reset the hearing date after March 18, 2015.

3. The Initial Hearing should be continued for two main reasons. First, the parties are currently discussing a mechanism to resolve this matter without incurring the time and expense of a hearing on the merits. Proceeding with a February 19 hearing date would deprive the parties of sufficient time to achieve this goal. Second, Lyft has engaged Post & Schell, P.C., which is new to these proceedings. This continuance shall give counsel additional time to assist in discussions and the evidentiary hearing.

4. For the foregoing reasons, Lyft respectfully requests that this motion be granted.

1

Michael W. Gang (Pa. I.D. 25670) Devin T. Ryan (Pa. I.D. 316602) Post & Schell, P.C. 17 North Second St., 12th Floor Harrisburg, PA 17101-1601 Phone: (717) 731-1970 Fax: (717) 731-1985 mgang@postschell.com dryan@postschell.com

Respectfully submitted:

Richard P. Sobiecki (Pa. I.D. 94366) Andrew T. George (Pa. I.D. 208618) Baker Botts L.L.P. 1299 Pennsylvania Ave., NW Washington, D.C. 20004 Phone: (202) 639-7700 Fax: (202) 639-1168 rich.sobiecki@bakerbotts.com andrew.george@bakerbotts.com

Danny David (admitted pro hac vice) Baker Botts L.L.P. 910 Louisiana St. Houston, TX 77002 Phone: (713) 229-1234 Fax: (713) 229-2855 danny.david@bakerbotts.com

Dated: January 13, 2015