



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE
REFER TO OUR FILE

February 27, 2012

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Pennsylvania Public Utility Commission, Bureau of Transportation
and Safety v. Adamo Limousine LTD
Docket No. C-2010-2180666

Pennsylvania Public Utility Commission, Bureau of Transportation
and Safety v. Adamo Limousine LTD
Docket No. C-2011-2262621

Dear Secretary Chiavetta:

Enclosed for filing are an original and three (3) copies of the Joint Motion for Continuance on behalf of the Bureau of Investigation and Enforcement of the Pennsylvania Public Utility Commission (formerly Bureau of Transportation and Safety) and Adamo Limousine LTD in the above-captioned consolidated matter. Copies have been served on the parties of record in accordance with the Certificate of Service.

Should you have any questions, please feel free to contact me.

Sincerely,

Michael L. Swindler
Prosecutor
PA Attorney ID No. 43319

Enclosure

cc: As per Certificate of Service

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Transportation and Safety	:	
	:	
v.	:	C-2010-2180666
	:	
Adamo Limousine LTD	:	
	:	
	:	
Pennsylvania Public Utility Commission,	:	
Bureau of Transportation and Safety	:	
	:	
v.	:	C-2011-2262621
	:	
Adamo Limousine LTD	:	

JOINT MOTION FOR CONTINUANCE

NOW COME, Adamo Limousine LTD (“Adamo”), Respondent in the above-consolidated matters, and the Pennsylvania Public Utility Commission’s Bureau of Investigation and Enforcement (“I&E”), Complainant in the above-consolidated matters (collectively referred to herein as “Parties”), by and through their respective counsel, and move as follows:

1. On or about September 9, 2009, the Pennsylvania Public Utility Commission (“Commission”) issued to Adamo a General Assessment Invoice for Fiscal Year 2009-2010 in the amount of \$8,800.00, and directed that payment be made within thirty (30) days. Adamo failed to file objections to the assessment and failed to pay the assessment.

2. On or about June 10, 2010, the Commission's Bureau of Transportation and Safety filed a formal complaint with the Commission against Adamo at Docket No. C-2010-2180666 for failure to pay its 2009-10 assessment. The matter was assigned to Administrative Law Judge David A. Salapa ("ALJ Salapa").

3. On or about September 15, 2010, the Commission issued to Adamo a General Assessment Invoice for Fiscal Year 2010-2011 in the amount of \$6,304.00, and directed that payment be made within thirty (30) days. Adamo failed to file objections to the assessment and failed to pay the assessment.

4. On or about September 14, 2011, the Commission's Bureau of Transportation and Safety filed a formal complaint with the Commission against Adamo at Docket No. C-2011-2262621 for failure to pay its 2010-2011 assessment.

5. On October 25, 2011, counsel for Respondent Adamo filed a Motion to Consolidate the two assessment complaint matters given that the complaints shared common parties and common issues of law. This Motion was not opposed.

6. By Order of ALJ Salapa dated November 18, 2011, the above-docketed matters were consolidated for purposes of hearing and disposition.

7. The Parties have executed a payment arrangement whereby Respondent Adamo agrees to pay the total remaining combined balance of \$14,104¹ over a period of six months in order to satisfy the complaints. Should Respondent abide by the terms of the payment arrangement, thereby satisfying the balance due that is the subject of this

¹ Two payments of \$500 each were made on December 15, 2010 and October 18, 2011 and applied toward Adamo's 2009-2010 assessment arrearage.

proceeding, Complainant will take the necessary action to close the complaint proceedings by filing a certificate of satisfaction pursuant to 52 Pa. Code § 5.24, or take such other action as directed by the presiding officer. Should Respondent fail to comply with the terms of the payment arrangement, Complainant will move forward with the proceeding before ALJ Salapa and seek payment of the total amount due as well as revocation of Respondent's certificate of public convenience.

8. Accordingly, the Parties hereby respectfully request by filing this Motion that ALJ Salapa continue the above-consolidated proceedings for a period of six months, or until at least July 16, 2012, in order to allow sufficient time for the terms of the amicable arrangement between the Parties to be fulfilled. Upon Respondent's compliance with the terms of the arrangement at the end of the six-month payment period resulting in payment of the total remaining balance due of \$14,104.00 for the assessment amounts for Fiscal Years 2009-2010 and 2010-2011 that are the subject of this consolidated proceeding, the Complainant will file with the Commission a certificate of satisfaction of said formal complaints in order to close the consolidated complaint proceeding.

WHEREFORE, The Pennsylvania Public Utility Commission's I&E and Adamo Limousine LTD respectfully request that the above-consolidated matter at Docket Nos. C-2010-2180666 and C-2011-2262621 be continued until at least July 16, 2012, in order to allow for the fulfillment of the terms of the amicable arrangement entered into between the Parties. Should Respondent fail to comply with the terms of said arrangement, the Parties shall advise ALJ Salapa and the matter shall proceed forward. Otherwise, at or

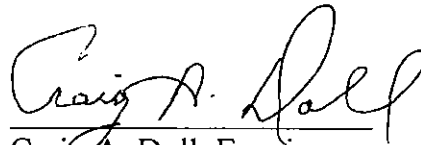
about July 16, 2012, and upon full compliance by Respondent of the terms of the arrangement, the total amount due having been paid, the Commission shall prepare and file a certificate of satisfaction of said complaints, or take such other action as directed by the presiding officer, in order to end the formal complaint proceedings and mark this matter closed.

Respectfully submitted,



Michael L. Swindler
Prosecutor
PA Attorney ID No. 43319

Counsel for Complainant,
Pennsylvania Public Utility Commission
Bureau of Investigation & Enforcement



Craig A. Doll, Esquire
PA Attorney ID No. 22814

Attorney for Respondent,
Adamo Limousine LTD

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(717) 787-5000

Dated: February 27, 2012

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing Joint Motion for Continuance upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

Hand Delivery:

David A. Salapa
Administrative Law Judge
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105

Craig A. Doll, Esq.
25 West Second Street
P.O. Box 403
Hummelstown, PA 17036-0403
(Attorney for Respondent)



Michael L. Swindler
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Dated: February 27, 2012

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