



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

IN REPLY PLEASE  
REFER TO OUR FILE

C-2012-2314500

November 28, 2012

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

Re: Pennsylvania Public Utility Commission, Bureau of Investigation  
and Enforcement v. Valley Limousine Service, LLC  
Docket No. C-2012-2314500

Dear Secretary Chiavetta:

Enclosed for filing is an original copy of the Motion for Default Judgment of the Bureau of Investigation and Enforcement of the Pennsylvania Public Utility Commission in the above-captioned matter. Copies have been served on the parties of record in accordance with the Certificate of Service.

Sincerely,

A handwritten signature in black ink, appearing to read "SMW", is written over a horizontal line.

Stephanie M. Wimer  
Prosecutor  
Attorney I.D. No. 207522

Enclosure

cc: As per certificate of service

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement	:	
Complainant	:	
v.	:	Docket No. C-2012-2314500
	:	
Valley Limousine Service, Inc.	:	
Respondent	:	

**NOTICE TO PLEAD**

Pursuant to 52 Pa. Code §5.103, the Bureau of Investigation and Enforcement (I&E) of the Pennsylvania Public Utility Commission (Commission) has filed a Motion for Default Judgment in the above-captioned matter. You are hereby notified to file a written response within twenty (20) days of the service of the Motion, consistent with Commission procedural regulations at 52 Pa. Code §5.61.

Your Answer must be verified and the original and three (3) copies sent to:

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

Additionally, you must serve a copy on:

Wayne T. Scott  
First Deputy Chief Prosecutor  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
P.O. Box 3265  
Harrisburg, PA 17105

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Stephanie M. Wimer  
Prosecutor  
Attorney I.D. 207522

Bureau of Investigation and Enforcement  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
(717) 787-5000

Dated: November 28, 2012

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement	:	
Complainant	:	
	:	Docket No. C-2012-2314500
v.	:	
	:	
Valley Limousine Service, LLC	:	
Respondent	:	

**MOTION FOR DEFAULT JUDGMENT**

NOW COMES the Pennsylvania Public Utility Commission’s (“Commission”) Bureau of Investigation and Enforcement (“I&E”), by its counsel, and files this Motion for Default Judgment against Valley Limousine Service, LLC (“Respondent”) pursuant to Section 5.103 of the Commission’s regulations, 52 Pa. Code §5.103. In support thereof, I&E respectfully represents as follows:

1. I&E commenced this action on July 18, 2012, by filing a Complaint and serving it by certified mail to Respondent at 1302 Gary Street, Bethlehem, PA 18018.
2. The Complaint was returned by the United States Post Office to the Commission on July 27, 2012.
3. On July 30, 2012, the Complaint was re-served to Respondent by certified mail at 2312 Esquire Drive, Easton, PA 18045.
4. 2312 Esquire Drive, Easton, PA 18045 is the last known street address that Respondent provided to the Commission.
5. On August 28, 2012, the United States Post Office returned the Complaint to the Commission and noted that it was unclaimed.
6. On August 30, 2012, the Complaint was re-served to Respondent by first class mail at 2312 Esquire Drive, Easton, PA 18045.

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BUREAU OF INVESTIGATION AND ENFORCEMENT  
JUL 27 2012

7. Attached to the Complaint was a Notice advising Respondent that it must file an Answer within twenty (20) days of service of the Complaint.
8. The Notice also advised Respondent that if it failed to answer the Complaint, I&E would request that the Commission issue an Order imposing the penalty set forth in the Complaint.
9. Respondent did not file an Answer to the Complaint and has not paid its outstanding assessment balance or civil penalty.
10. On or around October 19, 2012, a representative from Valley Limousine Service, LLC provided I&E with Respondent's post office box address of P.O. Box 3616, Easton, PA 18043.
11. On October 25, 2012, I&E filed an Amended Complaint to reflect Respondent's post office address.
12. The Amended Complaint was served by first class mail to Respondent's street address of 2312 Esquire Drive, Easton, PA 18045 and Respondent's post office box at P.O. Box 3616, Easton, PA 18043.
13. Attached to the Amended Complaint was a Notice advising Respondent that it must file an Answer within twenty (20) days of service of the Amended Complaint.
14. The Notice also advised Respondent that if it failed to answer the Amended Complaint, I&E would request that the Commission issue an Order imposing the penalty set forth in the Amended Complaint.
15. The twenty (20) days to file an Answer to the Amended Complaint expired on November 14, 2012.
16. To date, Respondent has not filed an Answer to the Amended Complaint.
17. To date, Respondent has not paid his outstanding assessment balance, which totals \$1,641, and the \$2,245 civil penalty that was proposed in the Amended Complaint.
18. I&E respectfully requests that the Commission enter a Default Order against Respondent that:
  - a. Orders Respondent to pay its outstanding assessment and civil penalty;
  - b. Cancels Respondent's certificate of public convenience;

- c. Notifies Respondent that a copy of this Order will be sent to the Pennsylvania Department of Transportation for the suspension or revocation of vehicle registrations that were used under Respondent's operating authority; and
- d. Directs the Bureau of Administrative Services, Assessment Section to refer the matter to the Pennsylvania Office of Attorney General for collection of the unpaid assessments.

Respectfully submitted,



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Stephanie Wimer  
Prosecutor  
Attorney ID # 207522  
Bureau of Investigation and Enforcement

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

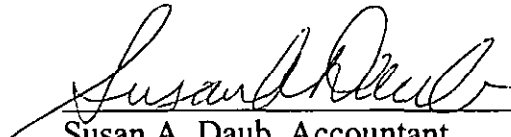
Date: November 28, 2012

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**VERIFICATION**

I, Susan A. Daub, Accountant, Bureau of Administrative Services, Assessment Section, hereby state that the facts above set forth are true and correct to the best of my knowledge, information, and belief and that I expect the Bureau will be able to prove the same at any hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.

Date: November 28, 2012



Susan A. Daub, Accountant  
Assessment Section  
Bureau of Administrative Services  
PA. Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

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**CERTIFICATE OF SERVICE**

I hereby certify that I am this day serving a true copy of the foregoing Motion for Default Judgment in accordance with the requirements of 52 Pa. Code § 1.54 *et seq.* (relating to service by a party).

**Service by First Class Mail:**

Tom Pfeiffer, President  
Valley Limousine Service, LLC  
P.O. Box 3616  
Easton, PA 18043

Tom Pfeiffer, President  
Valley Limousine Service, LLC  
2312 Esquire Drive  
Easton, PA 18045



Stephanie M. Wimer  
Prosecutor  
Attorney I.D. No. 207522

Counsel for the Bureau of  
Investigation and Enforcement,  
Pennsylvania Public Utility  
Commission

P.O. Box 3265  
Harrisburg, PA 17105-3265  
(717) 787-5000

Dated: November 28, 2012

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