

Application of Rasier-PA LLC, a Wholly
Owned Subsidiary of Uber
Technologies, Inc. for a Certificate of
Public Convenience Evidencing
Approval to Operate an Experimental
Ride-Sharing Network Service

BEFORE THE PENNSYLVANIA PUBLIC
UTILITY COMMISSION

Docket No.: A-2014-2424608

REQUEST FOR CONTINUANCE

To the Honorable Administrative Law Judges Mary D. Long and Jeffrey A. Watson,

Following the prehearing conference held on July 24, 2014, Justine L. Pate, Esq., Representing Keystone Cab Service, Inc., E-Z Taxi, Good Cab, LLC and United Cab, LLC, hereby respectfully requests that the presiding Administrative Law Judges grant her request for a continuance in this matter.

1. Respondent has concerns that the hearing schedule proposed by the Administrative Law Judges and Applicant will impact due process rights in this matter. Respondent filed a timely protest to the Applicant's Application on or about June 30, 2014 via electronic filing. This was the first time Respondent was present in the instant case. Applicant then received notice of the Prehearing Conference Order and participated via telephone.
2. Applicant has requested an August 18 hearing, which would allow Respondent two months to conduct discovery. Respondent would suggest that the August 18 hearing date does not allow Respondent time to conduct any kind of meaningful discovery in this matter. Respondent expressed concerns about timing and not having adequate time to prepare at the Prehearing Conference. It should be noted that Applicant's Allegheny County Application was filed on or about April 14, 2014, while Applicant's state wide Application was filed on or about June 2, 2014.
3. While Respondent does not object to the joining of both Dockets, Respondent does object to any scheduling orders which would infringe on Respondent's right to conduct discovery and proceed in an adversarial hearing with full information. Respondent was not aware during the Prehearing Conference that the Commission had previously informed the parties to the Allegheny County docket of an August deadline for hearing. To proceed on such a schedule would, without doubt, put Respondent at a severely prejudiced disadvantage.
4. Moreover, the Commission has scheduled an En Banc hearing to take place August 28, 2014. The purpose of this hearing is 'to seek testimony regarding transportation industry issues'. A highlighted topic to be discussed is 'Rules for Transportation Network Companies.'. A copy of the Commission's Secretarial Letter in this matter is attached to this request. A hearing date *after* this

Commission hearing is in the best interest of Applicant, Respondent and economy of the Commission's resources.

5. Further, Respondent has located and plans to call an additional witness in the above captioned case. Such witness, identified as Joshua Freedman, will not be available to testify at the August 18th and August 19th hearings. Mr. Freedman will produce testimony regarding the use of App-based technological services, and the use of such an App by common carriers. This will also serve as notice to all parties of Mr. Freedman being added to Respondent's witness list.
6. Respondent has reached out to Counsel on this matter. Attorney Michael S. Henry, Esq. has raised no objection to Respondent's request, Attorney Joseph Sucec, Esq. has raised no objection in this request, Attorney David Donley, Esq. has raised no objection to this request, Attorney Karen Moury, has raised an objection to this request.

Wherefore, Keystone Cab Service, Inc., EZ Taxi, LLC, United Cab, LLC, and Good Cab, LLC respectfully request that the Commission grant an extension in this matter for the reasons outlined above.

Respectfully Submitted,

Date: 8-4-14

By: /s/
Justine L. Pate, Esq.

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PROOF OF SERVICE

I hereby certify that I served the foregoing **Respondent's request for**
Continuance by placing a true and correct copy thereof in the United States Mail, first
class postage prepaid, addressed as follows:

Mary D. Long
Administrative Law Judge
Pennsylvania Public Utility Commission
301 5th Avenue, Suite 220
Pittsburgh, PA 15222

Jeffrey A. Watson
Administrative Law Judge
Pennsylvania Public Utility Commission
301 5th Avenue, Suite 220
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Karen O. Moury
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409 North Second Street, Suite 500
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Dated: 8/4/14 _____ /s/ _____