

**Mark Feinman**  
*Attorney at Law*

*Philadelphia Office*  
8171 Castor Avenue  
Philadelphia, PA 19152  
(215) 742-9050 Fax (215) 742-9080

*Bucks County Office*  
49 Cropwell Lane  
Holland, PA 18966  
(215) 504-9626

*E-mail: [markfeinmanlawoffices@verizon.net](mailto:markfeinmanlawoffices@verizon.net)*

October 20, 2014

Commonwealth of Pennsylvania  
Pennsylvania Public Utility Commission  
PO Box 3265  
Harrisburg, PA 17105-3265  
ATTN: ROSEMARY CHIAVETTA

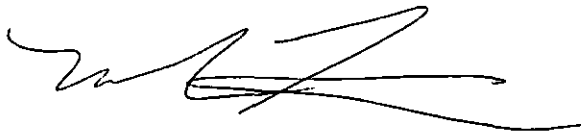
**RE: Path Trans Care, Inc.**  
**NO.: C-2014-2443214**

Dear Ms. Chiavetta:

Enclosed herein please find an original and one (1) copy of an Answer to the Complaint relative to the above-captioned matter. Kindly file the original and return a time-stamped copy to my office in the enclosed envelope.

Thank you for your prompt attention to this matter.

Very truly yours,



**MARK FEINMAN**

MF/gmr  
Enclosures

RECEIVED  
2014 OCT 23 AM 10:42  
PA P.U.C.  
SECRETARY'S BUREAU

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

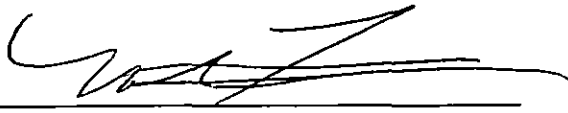
PENNSYLVANIA PUBLIC UTILITY COMMISSION :  
BUREAU OF TRANSPORTATION AND SAFETY : NO.: C-2014-2443214  
:  
VS. :  
:  
PATH TRANS CARE, INC. :  
2301 TREMONT STREET :  
PHILADELPHIA, PA :

ANSWER TO THE COMPLAINT

Respondent, Path Trans Care, Inc. by and through Counsel, Mark Feinman, Esquire does hereby file this Answer to the Complaint of Plaintiff, Pennsylvania Public Utility Commission, Bureau of Transportation and Safety and states as follows:

- 1-3. Admitted.
- 4. Admitted in part. Denied in part. It is admitted that on July 30, 2013, a letter was sent to Respondent granting its request for a voluntary suspension until May 14, 2014. It is admitted that Respondent was also informed to notify the Commission of the intent to resume operations. It is specifically denied that Respondent has abandoned or discontinued service without notifying the Commission. Further, Respondent has not operated during the period of suspension up to and including the current time and has not failed to comply with the requirements under the issued license.
- 5. Denied. It is denied that Respondent violated 52 Pa. Code Section 3.381(a)(1)(v) and/or 66 Pa. C.S. Section 1102(a)(2). Respondent has prepared to resume operations and in preparation for resumption of operation has started the process to secure insurance on any and all vehicles owned by Respondent to be used in operations under the referenced license. Respondent will not operate until authorization and approval from the Commission has been received and Respondent has complied with all requirements of the Pennsylvania Public Utility Commission and the obligations under the license including proof of insurance.

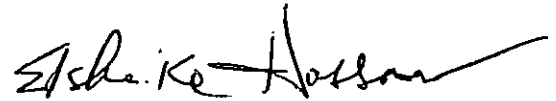
WHEREFORE, Respondent respectfully requests the Complaint of Plaintiff be dismissed.

BY:   
MARK FEINMAN, ESQUIRE  
8171 CASTOR AVENUE  
PHILADELPHIA, PA 19152  
(215) 742-9050

RECEIVED  
2014 OCT 23 AM 10:42  
PA P.U.C. BUREAU  
SECRETARY'S BUREAU

**VERIFICATION**

I, ELSHEIK HASSAN, hereby state that I am the Respondent in this action and verify that the statements made in the foregoing Answer to the Complaint are true and correct to the best of my knowledge, information and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa.C.S.A. §4904 relating to unsworn falsification to authorities.




ELSHEIK HASSAN, PATH  
TRANS CARE, INC.

RECEIVED  
2014 OCT 23 AM 10:42  
PA P.U.C.  
SECRETARY'S BUREAU

LAW OFFICES OF MARK FEINMAN  
8171 CASTOR AVENUE  
PHILADELPHIA, PA 19152

PHILADELPHIA  
PA 191  
21 OCT '14  
PM 8 L



UNITED STATES POSTAGE  
  
PITNEY BOWES  
\$000.69<sup>0</sup>  
02 1P  
0003295472  
MAILED FROM ZIP CODE 19152

RECEIVED

2014 OCT 23 AM 10:42

PA. P.U.C.  
SECRETARY'S BUREAU

Commonwealth of Pennsylvania  
Pennsylvania Public Utility Commission  
PO Box 3265  
Harrisburg, PA 17105-3265  
ATTN: ROSEMARY CHIAVETTA

17105326565

