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April 13, 2015

**VIA ELECTRONIC FILING**

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

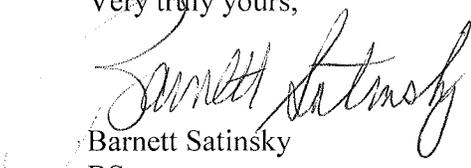
Re: Application of Granny's Helping Hands PA, Inc.  
Docket Number: A-2014-2449185 (Amended)

Dear Secretary Chiavetta:

Enclosed for filing is Joint Protestants Suburban Transit Network, Inc. t/a TransNet, Willow Grove Yellow Cab Co., Inc. t/d/b/a Bux-Mont Yellow Cab and t/d/b/a Bux-Mont Transportation Services Co., Easton Coach Company t/a Norristown Transportation Company, Tri County Transit Service, Inc., and Bucks County Transport, Inc.'s **Motion for Sanctions**, and Certificate of Service.

Thank you for your cooperation.

Very truly yours,

  
Barnett Satinsky

BS:mo

Enclosure

cc: Darlene D. Heep, Administrative Law Judge (w/encl.) *(via First Class Mail and email)*  
Michael S. Henry, Esquire (w/encl.) *(via e-Service: mshenry@ix.netcom.com and mshenry@sghlawgroup.com)*  
Charles E. Thomas, III, Esquire (w/encl.) *(via e-Service: cet3@tntlawfirm.com)*  
Christine Soares, Esquire (w/encl.) *(via email)*  
Ms. Patricia Moir (w/encl.) *(via email)*  
Mr. Samuel Valenza (w/encl.) *(via email)*  
Mr. Mark E. Glatz (w/encl.) *(via email)*  
Mr. James Tammaro (w/encl.) *(via email)*  
Mr. James Raymond (w/encl.) *(via email)*

A Pennsylvania Limited Liability Partnership

California Colorado Connecticut Delaware District of Columbia  
Florida Nevada New Jersey New York Pennsylvania

**COMMONWEALTH OF PENNSYLVANIA  
BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**APPLICATION OF GRANNY'S : DOCKET A-2014-2449185 (Amended)**  
**HELPING HANDS PA, INC. : (Electronically Filed)**

**SUBURBAN TRANSIT NETWORK, INC. T/A TRANSNET'S,  
WILLOW GROVE YELLOW CAB CO., INC. T/D/B/A BUX-MONT  
YELLOW CAB AND T/D/B/A BUX-MONT TRANSPORTATION  
SERVICES CO.'S, EASTON COACH COMPANY T/A NORRISTOWN  
TRANSPORTATION COMPANY'S, TRI COUNTY TRANSIT SERVICE, INC.'S  
AND BUCKS COUNTY TRANSPORT, INC.'S MOTION FOR SANCTIONS**

Protestants Suburban Transit Network, Inc. t/a TransNet, Willow Grove Yellow Cab Co., Inc. t/d/b/a Bux-Mont Yellow Cab and t/d/b/a Bux-Mont Transportation Services Co., Easton Coach Company t/a Norristown Transportation Company, Tri County Transit Service, Inc., and Bucks County Transport, Inc. (jointly referred to herein as "Joint Protestants"), by their attorneys, file this Motion for Sanctions, pursuant to 52 Pa. Code §§ 5.342, 5.371, and 5.372, the basis of which is as follows:

1. Applicant's name and docket number of the application:

Granny's Helping Hands PA, Inc.<sup>1</sup>  
(hereinafter referred to as "GHH" or "Applicant")  
P. O. Box 725  
Lansdowne, Delaware County, PA 19050

Docket number A-2014-2449185 (Amended)

2. Names, business addresses and telephone numbers of the Joint Protestants:

- (a) Suburban Transit Network, Inc.  
(hereinafter referred to as "TransNet")  
980 Harvest Drive, Suite 100  
Blue Bell, PA 19422  
(215) 542-7433

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<sup>1</sup> In various documents, Applicant is referred to as "Granny's Helping Hands PA Inc.", "Grannys Helping Hands PA, Inc.", "Granny's Helping Hands Pa Inc.", "Granny's Helping Hands PA. Inc.", and "Granny's Helping Hands Inc."

- (b) Willow Grove Yellow Cab Co., Inc.  
t/d/b/a Bux-Mont Yellow Cab and  
t/d/b/a Bux-Mont Transportation Services Co.  
(hereinafter referred to as "Bux-Mont")  
701 Lincoln Avenue  
Willow Grove, PA 19090  
(215) 659-8865
- (c) Easton Coach Company  
t/a Norristown Transportation Company  
(hereinafter referred to as "ECC")  
1200 Conroy Place  
Easton, PA 18040  
(610) 253-4055
- (d) Tri County Transit Service, Inc.  
(hereinafter referred to as "Tri County")  
110 Industrial Parkway  
Sanatoga, PA 19464  
(610) 495-5640
- (e) Bucks County Transport, Inc.  
(hereinafter referred to as "BCT")  
Buckingham Green II  
P.O. Box 510  
Holicong, PA 18928  
(215) 794-5554

3. Names, business addresses, telephone and fax numbers and email addresses of Protestants' attorneys:

Barnett Satinsky, Esquire  
Christine Soares, Esquire  
Fox Rothschild LLP  
2000 Market Street – 20<sup>th</sup> Floor  
Philadelphia, PA 19103 - 3222  
(215) 299-2088, 2864 (telephone)  
(215) 299-2150 (fax)  
bsatinsky@foxrothschild.com  
csoares@foxrothschild.com

4. Name, business address, fax and telephone number of Applicant's attorney:

Michael S. Henry, Esquire  
Salaman, Grayson & Henry, P.C.  
100 S. Broad Street, Suite 650  
Philadelphia, PA 19110-1030  
(215) 789-9405  
(215) 557-6353  
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mshenry@ix.netcom.com

5. GHH filed with the Pennsylvania Public Utility Commission (the "Commission") an application for approval to begin to transport, as a common carrier, by motor vehicle, persons, in paratransit service, between points in the Counties of Bucks, Chester, Delaware, Montgomery and Philadelphia.

6. Notice of the application was published in the Pennsylvania Bulletin dated February 14, 2015.

7. Protests to the application were due on or before March 2, 2015.

8. Joint Protestants timely filed a joint protest to Applicant's application on February 17, 2015.

9. On February 18, 2015, Joint Protestants mailed GHH by certified mail, return receipt requested, their First Set of Interrogatories. Service was accepted on February 23, 2015.

10. Applicant's response to Joint Protestants' First Set of Interrogatories was due within 20 days of service of the request, or March 16, 2015.

11. Applicant failed to provide answers to Joint Protestants' First Set of Interrogatories.

12. On March 18, 2015, Joint Protestants filed a Motion to Compel the Applicant to answer to Joint Protestants' First Set of Interrogatories (the "Motion to Compel").

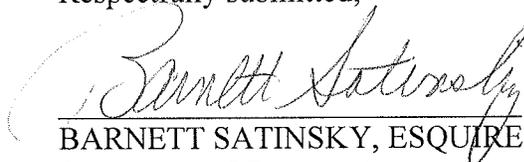
13. On April 1, 2015, Administrative Law Judge Darlene D. Heep issued Prehearing Order #2 granting the Motion to Compel and directing that Applicant must provide answers to the Joint Protestants' First Set of Interrogatories no later than April 10, 2015.

14. Applicant has failed to comply with ALJ Heep's Order and has not provided Answers to Joint Protestants' First Set of Interrogatories.

15. Hearing in this matter is scheduled for April 30, 2015, but Joint Protestants cannot properly prepare their case without the benefit of the requested discovery.

WHEREFORE, Joint Protestants TransNet, Bux-Mont, ECC, Tri County, and BCT respectfully request an Order cancelling the April 30, 2015 hearing and dismissing the Application of Granny's Helping Hands PA, Inc.

Respectfully submitted,



BARNETT SATINSKY, ESQUIRE  
PA Attorney I.D. # 15767

CHRISTINE SOARES, ESQUIRE  
PA Attorney I.D. # 203497

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Attorney for Joint Protestants  
Suburban Transit Network, Inc. t/a TransNet,  
Willow Grove Yellow Cab Co., Inc. t/d/b/a Bux-Mont  
Yellow Cab and t/d/b/a/ Bux-Mont Transportation  
Services Co., Easton Coach Company t/a Norristown  
Transportation Company, Tri County Transit Service, Inc.,  
and Bucks County Transport, Inc.

April 13, 2015

APPLICATION OF GRANNY'S : DOCKET A-2014-2449185 (Amended)  
HELPING HANDS PA, INC. : (Electronically Filed)

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this 13<sup>th</sup> day of April, 2015, served a true copy of Joint Protestants Suburban Network Transit, Inc. t/a TransNet's, Willow Grove Yellow Cab Co., Inc. t/d/b/a Bux-Mont Yellow Cab and t/d/b/a Bux-Mont Transportation Services Co.'s, Easton Coach Company t/a Norristown Transportation Company's, Tri County Transit Service, Inc.'s, and Bucks County Transport, Inc.'s Motion for Sanctions upon the participants listed below, in accordance with the requirements of 52 Pa. Code § 1.54 by the methods set forth below, postage prepaid.

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
*(By eFiling)*

Darlene D. Heep, Administrative Law Judge  
Pennsylvania Public Utility Commission  
801 Market Street, Suite 4063  
Philadelphia, PA 19107  
*(By First Class Mail and email)*

Michael S. Henry, Esquire  
Salaman, Grayson & Henry, P.C.  
100 S. Broad Street, Suite 650  
Philadelphia, PA 19110-1030  
mshenry@sghlawgroup.com  
mshenry@ix.netcom.com  
*(counsel for Applicant)*  
*(By e-Service: mshenry@ix.netcom.com and  
mshenry@sghlawgroup.com)*

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Thomas, Niesen & Thomas, LLC  
212 Locust Street, Suite 600  
P.O. Box 9500  
Harrisburg, PA 17108-9500  
*(Counsel for Rover Community Transportation, Inc.)*  
*(By e-Service: cet3@tnlfirm.com)*

  
BARNETT SATINSKY, ESQUIRE