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Barnett Satinsky

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May 20, 2015

VIA ELECTRONIC FILING

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

Re: Application of Laye Kourouma t/a Kourouma Transport

Docket Number: A-2015-2473517

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 to Compel Applicant to Answer Joint Protestants' First Set of Interrogatories, a copy of which is being served on the Applicant.

Thank you for your cooperation.

Very truly yours,

Barnett Satinsky BS:lwh Enclosure

cc:

Laye Kourouma (Owner/Applicant) (w/encl.)

(via e-Service: kouroumatransport@hotmail.com)

Charles E. Rainey, Jr., Chief Admin. Law Judge (w/encl.) (via First Class Mail and email)

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 Florida Colorado Nevada Connecticut New Jersev Delaware New York District of Columbia
Pennsylvania

COMMONWEALTH OF PENNSYLVANIA BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN RE: APPLICATION OF

DOCKET A-2015-2473517

LAYE KOUROUMA

(Electronically Filed)

T/A KOUROUMA TRANSPORT

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 TO COMPEL APPLICANT
LAYE KOUROUMA T/A KOUROUMA TRANSPORT, TO ANSWER JOINT
PROTESTANTS' FIRST SET OF INTERROGATORIES

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 to Compel Answers to their First Set of Interrogatories Directed to Laye Kourouma t/a Kourouma Transport, 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:

Laye Kourouma t/a Kourouma Transport (hereinafter referred to as "Kourouma" or "Applicant") 203 West Baltimore Avenue Lansdowne, Delaware County, PA 19050

Docket number A-2015-2473517

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
- (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. <u>Names, business addresses, telephone and fax numbers and email addresses of Protestants' attorneys:</u>

Barnett Satinsky, Esquire Christine Soares, Esquire Fox Rothschild LLP 2000 Market Street – 20th 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:

 Unknown.
- 5. Kourouma filed with the Pennsylvania Public Utility Commission (the "Commission") an application for approval to transport, as a common carrier, by motor vehicle, persons in paratransit service, from points in the City and County of Philadelphia and the Counties of Bucks, Chester, Delaware and Montgomery, to points in Pennsylvania, and return.
- 6. Notice of the application was published in the Pennsylvania Bulletin dated April 18, 2015.
 - 7. Protests to the application were due on or before May 4, 2015.
- 8. Joint Protestants timely filed a joint protest to Applicant's application on April 22, 2015.
- 9. On April 24, 2015, Joint Protestants e-served to Kourouma their First Set of Interrogatories, attached hereto as Exhibit "A." A copy of the email transmitting the Interrogatories to Kourouma is attached hereto as Exhibit "B."

- 10. The undersigned counsel spoke with the Applicant on May 7, 2015, at which time the Applicant indicated he wanted to go to hearing to present his case and that he apparently did not intend to respond to the Interrogatories which had been propounded by Joint Protestants.
- 11. Applicant has failed to provide answers to Joint Protestants' First Set of Interrogatories as of the date of this Motion.

WHEREFORE, Joint Protestants TransNet, Bux-Mont, ECC, Tri County, and BCT respectfully request an Order compelling Laye Kourouma t/a Kourouma Transport, to immediately answer Joint Protestants' First Set of Interrogatories.

Respectfully submitted,

BARNETT SATINSKY, ESQUIR

PA Attorney I.D. # 15767

CHRISTINE SOARES, ESQUIRE

PA Attorney I.D. # 203497

FOX ROTHSCHILD LLP

2000 Market Street, 20th Floor

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215.299.2088, 2864 (phone)

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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.

May 20, 2015

CERTIFICATE OF SERVICE

I hereby certify that I have on this day 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 to Compel Applicant Laye Kourouma t/a Kourouma Transport, to Answer Joint Protestants' First Set of Interrogatories 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)

Charles E. Rainey, Jr., Chief Admin. Law Judge Pennsylvania Public Utility Commission Commonwealth Keystone Building P.O. Box 3265 Harrisburg, PA 17105-3265 (By First Class Mail, Postage Prepaid and email)

Laye Kourouma, Owner
Laye Kourouma t/a Kourouma Transport
203 West Baltimore Avenue
Lansdowne, PA 19050
(Applicant)
(By e-Service: kouroumatransport@hotmail.com)

Charles E. Thomas, III, Esquire
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@tntlawfirm.com)

BARNETT SATINSKY, ESQUIRE

PA Attorney I.D. # 15767

CHRISTINE SOARES, ESQUIRE

PA Attorney I.D. # 203497

FOX ROTHSCHILD LLP

2000 Market Street, 20th Floor Philadelphia, PA 19103-3222

215.299.2088, 2864 (phone)

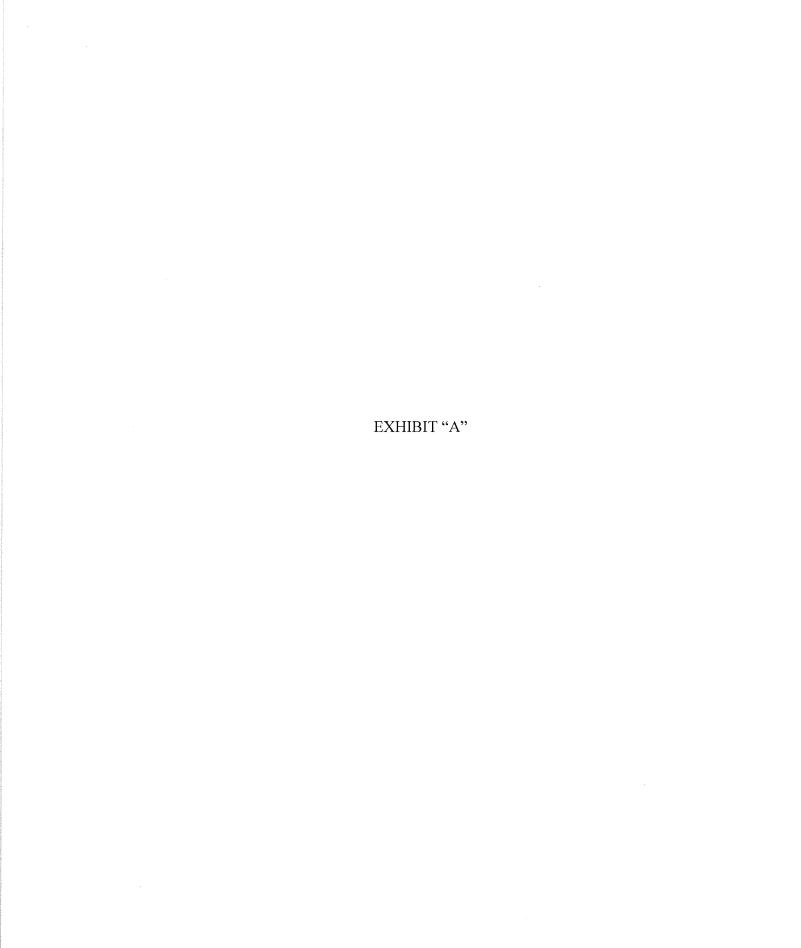
215.299.2150 (fax)

bsatinsky@foxrothschild.com

csoares@foxrothschild.com

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.

May 20, 2015





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Barnett Satinsky

Direct Dial: (215) 299-2088

Internet Address: bsatinsky@foxrothschild.com

April 24, 2015

VIA e-SERVICE: kouroumatransport@hotmail.com

Mr. Laye Kourouma Laye Kourouma t/a Kourouma Transport 203 West Baltimore Avenue Lansdowne, PA 19050

Re:

Application of Laye Kourouma t/a Kourouma Transport

Docket Number: A-2015-2473517

Dear Mr. Kourouma:

Enclosed with this letter please find the First Set of Interrogatories of 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., directed to Laye Kourouma t/a Kourouma Transport, and issued pursuant to 52 Pa. Code § 5.321 et seq.

When answering each question, please be sure to indicate the name of the person responsible for answering the interrogatory or producing the documents. Also, please attach an affidavit or verification for each person. Answers to interrogatories are due in this office and address within twenty (20) days.

Should you have any questions regarding these Interrogatories, please contact me at (215) 299-2088.

Very truly yours,

Barnett Satinsky

BS:lwh

Enclosure cc: Ch

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) ited Liability Partnership

California Florida Colorado Nevada Connecticut New Jersey

Delaware New York District of Columbia Pennsylvania

COMMONWEALTH OF PENNSYLVANIA BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN RE: APPLICATION OF : DOCKET A-2015-2473517

LAYE KOUROUMA : T/A KOUROUMA TRANSPORT :

JOINT PROTESTANTS

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 FIRST SET OF INTERROGATORIES DIRECTED TO LAYE KOUROUMA T/A KOUROUMA TRANSPORT

Pursuant to the provisions of section 333(d) of the Public Utility Code, 66 Pa. C.S.A. § 333(d), 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. (hereinafter collectively referred to as "Joint Protestants"), by their attorneys, submit and propound the following Interrogatories to Laye Kourouma t/a Kourouma Transport. The Interrogatories are to be answered separately and fully in writing, under oath, WITHIN 20 DAYS of service hereof, pursuant to 52 Pa. Code § 5.342(d).

These Interrogatories are continuing, and any information secured or discovered subsequent to the filing of your answers is to be supplied by supplemental answers.

I. DEFINITIONS

- 1. "Applicant" or "Kourouma" means applicant, Laye Kourouma t/a Kourouma Transport.
- 2. "You," "Your" or "Applicant" means applicant unless otherwise noted, including but not limited to any divisions, departments, subsidiaries, affiliates, predecessors, present or former officers, directors, shareholders, owners, supervisors, managers, employees, servants, workmen, representatives or agents of each entity and all other persons acting or purporting to act on behalf of each entity and all other persons acting or purporting to act on behalf of each such entity or person.
- 3. The term "documents" means all writings of any kind including the originals of all non-identical copies, whether different from the originals by reason of any notation made on such copies or otherwise (including without limitation), correspondence, memoranda, notes, diaries, statistics, letters, telegrams, minutes, contracts, reports, studies, checks, statements, receipts, returns, summaries, pamphlets, books, prospectuses, inter-office and intra-office communications, offers, notations of any sort of conversations, telephone calls,

meetings or other communications, bulletins, printed matter, computer printouts, teletypes, telefax, invoices, worksheets, and all drafts, alterations, modifications, changes and amendments of any of the foregoing, graphic or oral records or representations of any kind (including without limitation, photographs, charts, graphs, microfiche, microfilm, videotape, records, motion pictures) and electronic, mechanical or electric records or representations of any kind (including without limitation, tapes, cassettes, discs, recordings).

- 4. The term "all documents" means every document as above defined known to you and every such document that can be located or discovered by reasonably diligent efforts.
- 5. The phrase "within the scope of this application" refers to the authority as sought in the application to the Pennsylvania Public Utility Commission as shown in the Pennsylvania Bulletin published in this proceeding.
- 6. The term "identify" or "identification," when used in reference to an individual person, means to state his full name, his present or last known address, his present or last known position and business affiliation, and his position or affiliation with any party herein at any relevant time.
- 7. The term "identify," when used in reference to a corporation, partnership, or other business entity, means to state its full name and address, and, in the case of a corporation, the state of incorporation and the address of its principal place of business.
 - 8. The word "identify" when used in reference to a document means to:
 - (i) State the date, author, recipient, and type of document (<u>e.g.</u>, invoice, delivery receipt, etc.) or some other means of distinguishing the document);
 - (ii) Set forth or attach to the answer a true copy of the document;
 - (iii) Identify each person who prepared the document;
 - (iv) Identify each person who participated in the preparation of the document;
 - (v) State the present location of the document; and
 - (vi) Identify each person having custody or control of the document.
- 9. The term "identify" when used in reference to an oral communication means to:
 - (i) State the date, place or places, and parties to the oral communication or some other means of identifying the oral communication;

- (ii) Set forth the substance of the oral communication;
- (iii) State the medium through which the oral communication was made (e.g., in person or by telephone);
- (iv) Identify each person who participated in the oral communication;
- (v) Identify each person hearing the oral communication; and
- (vi) State whether any written note or memorandum of the oral communication was made and, if so, identify the written note or memorandum in the manner required to identify a document by definition # 8 above.
- 10. "Person" or "persons" means all individuals and entities, including, without limitation, individuals, representative persons, associations, companies, corporations, partnerships, limited partnerships, joint ventures, trusts, estates, public agencies, departments, divisions, bureaus and boards.
- 11. "Affiliation" means wherein the deponent owns any stock in another entity, holds an office in another entity, holds a position of management in another entity or has a financial interest in another entity.
- 12. All words of masculine gender shall include the feminine gender thereof and the singular shall include the plural.

II. INSTRUCTIONS

In answering each Interrogatory:

- 1. Identify each document and oral communication that forms the basis in whole or in part for each answer or that corroborates the answer or the substance thereof, stating separately each item required by definitions # 8 and # 9 above.
- 2. State whether the information furnished is within the personal knowledge of the Applicant and, if not, identify each person (if known) to whom the information is a matter of personal knowledge.
- 3. If the answer to an Interrogatory is not presently known to the Applicant, so state and, in addition, respond to the Interrogatory within ten (10) days after the date on which such answer becomes known to the Applicant.

III. <u>INTERROGATORIES</u>

1. Identify the owner(s), officers(s), director(s) and/or shareholders of Laye Kourouma t/a Kourouma Transport. For each, provide the following.				
	(a)	Percentage of ownership interest;		
	(b)	Position(s) held.		
2. been convicted of a		uary 1, 2005, has any officer, director or shareholder of Applicant If so describe:		
	(a)	the nature of the crime;		
	(b)	the date of sentencing and the sentence imposed.		
3. by motor vehicle?	What exp	erience do you have in the business of transportation of passengers		
4. I currently possess a	ny interes	ne owner(s), officer(s), director(s) and/or shareholder(s) of Applicant et, financial or otherwise, and/or been involved in the operations of ecated, which transported passengers for compensation? If so, please		
	(a)	the name and address of the entity;		
paratransit, etc.);	(b)	the principal business of the entity (i.e., taxicab, limousine,		

involvement i individual; an		the name of each individual who possesses the interest or well as the nature and extent of the interest and the duties of that
governmental	(e) agency.	all orders, certificates, or other evidence of approval from any
	5. What type	of transportation, if any, does Applicant currently render in
revenue)?	(a)	interstate commerce (give percentage of total transportation
transportation	(b) revenue)?	Pennsylvania intrastate commerce (give percentage of total
Pennsylvania i identify the type	ntrastate transj	ant transported within the past three (3) years passengers in portation, either directly or indirectly? If so, please explain and povided.
intrastate trans		locations from which the Applicant renders or intends to render ce.

a description of the service territory of the entity;

(c)

•	and attach copies of the authority and/or tariffs for paratransit rights to, Applicant by the Pennsylvania Public Utility Commission, if any.		
subject of any complaint to	Applicant or any of its officers, shareholders or directors ever been the the Pennsylvania Public Utility Commission, the Federal Motor on or any other state or federal regulatory or governmental agency?		
(a)	when the complaint occurred;		
(b)	the identity of the complainant;		
(c)	the nature of the complaint;		
(d)	the final disposition of the complaint; and		
(e) resolving the complaint.	produce copies of the complaint and any final order or settlement		
	copies of any agreements, contracts and leases and/or licensing r has had with any other transportation provider or supplier.		
11. Describe any business in which Applicant and each of its officers, shareholders and directors is engaged, other than the paratransit business.			

12. Identify by name and address the accountant of Applicant and any other persons responsible for auditing and/or maintaining financial records of Applicant.					
	-	all persons who are employed by Applicant and who are expected to t, and give a summary of his/her expected testimony.			
supporting witnesses	s and giv	all persons who are expected to testify on behalf of Applicant as the a summary of their expected testimony as well as the name and they are representing.			
15. S following:	State for	each supporting witness you named in Interrogatory # 14, the			
	(a)	the number of trips you intend to provide for each witness;			
	(b)	the frequency of trips (each day, week, month, year);			
	(c)	the origin and destination points;			
	(d)	the transportation service now being used by each witness;			
	(e)	any special needs of witness; and			

(f) whether the service of any carrier presently being used by the supporting witness will be terminated or curtailed upon you becoming a certified carrier. If so give the name of the carrier and how much revenue it will lose.),
16. Set forth a list of all vehicles now owned, leased or controlled by Applican and identify with respect to each:	ıt,
(a) the year, make, model and mileage;	
(b) the price and the date when the vehicle was acquired by Applica	ınt
(c) the identity of the lessor for each vehicle, if any, and, if applicable the date, duration and method of financing of the lease;	ole,
(d) the seating capacity;	
(e) the license plate number and vehicle identification number; and	
(f) the air-conditioning, wheelchair capability, and any other feature	es.
17. With respect to each of the vehicles you identified in your answer to Interrogatory # 16 above, describe any special equipment, <u>e.g.</u> , wheelchair lifts, life support systems, medical emergency systems, emergency lighting equipment, installed or to be installed.	∍d.

18. Identify the vehicles Applicant proposes to use if the application for certificate of authority is granted, and state the following:				
	(a)	the year, make and model;		
	(b)	the price and the date when the vehicle was acquired by Applicant;		
		the identity of the lessor for each vehicle, if any, and, if applicable, of financing of the lease;		
((d)	the seating capacity;		
((e)	the license plate number and vehicle identification number; and		
((f)	the air-conditioning, wheelchair capability, and any other features.		
19. Plea	ise desc	cribe the method to be utilized to dispatch vehicles.		
Applicant, as well as ea	ich proj	ach office, garage or other location owned or operated by posed office, garage or other location, and describe the vehicle nd other facilities at each.		

21. Have any vehicles operated in Applicant's current business been involved in a reportable accident any at time from 2007 to the present? If so, provide the details as to each such accident.
22. Describe any special qualifications or licenses that will be required of drivers providing the proposed service.
23. Explain how Applicant will ensure that a driver's license has not been revoked.
24. Has Applicant, or any of its drivers, agents, servants, employees, or independent contractors, been convicted of a violation of the Motor Vehicle Code of any state while operating a vehicle, between January 1, 2008 and the date of the responses to these Interrogatories? If so, provide the details of each such violation, including date, case number, offense, and fine or other disposition of the case.
25. Identify each employee employed by Applicant as of the time of your response hereto, including his or her job titles (<u>i.e.</u> , drivers, maintenance, dispatch, etc).
26. Identify the independent contractors or other non-employees who perform services for Applicant, the nature of their job(s) and how often on average each works for you.

of any written contra related service to or f Counties of Bucks, C oral in nature, describ	ct or un from the chester, be the ag	any written or oral contracts or understandings, and produce copies derstanding, Applicant has to provide transportation service or below-listed entities in the City and County of Philadelphia and the Delaware, and Montgomery. If said contracts or understandings are greement, including, but not limited to, the duration of the d, and the nature of the transportation services provided.
	(a)	hospitals;
	(b)	other healthcare institutions;
	(c)	any private organization;
,	(d)	any agency of the Commonwealth of Pennsylvania; and
	(e)	any public organization.
28. Fı	ırnish Jo	oint Protestants with:
	(a)	your latest balance sheet and profit and loss statement;
Utility Commission;	(b)	the present application you filed with the Pennsylvania Public
Commission;	(c)	any other papers filed by you with the Pennsylvania Public Utility

impose for the transp	(d) portation	a rate schedule or description of the money charges you intend to services you intend to perform;
by Applicant;	(e)	any and all documents that set forth safety procedures to be used
	(f)	a description of any existing or proposed maintenance policies;
or local) which you expected subsidy; an	-	a description of any subsidy by a government agency (federal, state preceive for your transportation and the amount of such existing or
	(h)	a copy of Applicant's Bylaws.
	ant incl	opies of all advertising published, distributed, circulated or uding, but not limited to, brochures, yellow pages, newspapers, mail.
30. assigned?	(a)	Do you intend to utilize the first full day of hearing
assigned?	(b)	Do you intend to utilize more than the first full day of hearing
Interrogatory # 13 an	(c) ad Interre	Identify each witness not previously identified in Responses to ogatory # 14 you expect to call at the hearing of this matter.

31. Has the Applicant, or any individual associated with Applicant (whether by employment, ownership, or otherwise), either directly or indirectly sought operating rights from the Pennsylvania Public Utility Commission within the past three (3) years? If so, identify the name of the applicant, PUC docket number, and disposition or current status of such application.
32. State whether, at any time since January 1, 2008, Applicant has received a notice of cancellation or revocation concerning any insurance policy of Applicant. If so, describe the notice and/or circumstances surrounding any revocation.
33. Please describe in detail all studies, analyses, projections and/or forecasts Applicant has prepared or had prepared on its behalf with respect to expected traffic, revenues, expenses and profit to be generated in the future by the proposed service in the area covered by this application. Provide copies of all such studies, analyses, projections and/or forecasts.
34. Has the Applicant ever had a certificate of operating authority suspended or revoked by the Pennsylvania Public Utility Commission? If so, please state: (a) when the suspension or revocation occurred;
(b) the reason for the suspension or revocation;
(c) the final disposition of the suspension or revocation; and
(d) produce copies of the suspension or revocation notice and any final order or settlement resolving the suspension or revocation.

		pplicant ever rendered paratransit service in a territory for which it aratransit operating authority? If so, please state:
(a) the date, time and place of such authorized or unauthorized se including the place or origin and place of ending the trip;		
	(b)	the identity of the rider;
and/or unauthorized s	` '	produce copies of the log books which reflect such authorized and
	(d)	specify the amount of compensation paid for the service rendered.

36. Provide a copy of each document Applicant proposes to introduce as an exhibit in the hearing of this case.

37. Identify by name, title, and address all persons who have supplied information used in answering the foregoing interrogatories and identify, for each person involved, the specific interrogatory, or interrogatories, for which they supplied information.

BARNETT SATINSKY, ESQUIRF

PA Attorney I.D. # 15767

CHRISTINE SOARES, ESQUIRE.

PA Attorney I.D. # 203497

FOX ROTHSCHILD LLP

2000 Market Street, 20th Floor

Philadelphia, PA 19103-3222

215.299.2088, 2864 (phone)

215.299.2150 (fax)

bsatinsky@foxrothschild.com

csoares@foxrothschild.com

Attorneys for Joint Protestants
Suburban Transit Network, Inc. t/a TransNet,
Willow Grove Yellow Cab Co., Inc. t/d/b/a BuxMont 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.

DATED: April 24, 2015

VERIFICATION

Laye Kourouma t/a Kourouma Transport by its duly authorized officer, states that it is familiar with the information set forth in the foregoing Answers to Interrogatories, and that such Answers are true and correct to the best of its knowledge, information and belief.

The undersigned understands that false statements herein are made subject to the penalties of 18 Pa. C. S. § 4904 relating to unsworn falsification to authorities.

LAYE KOUROUMA T/A KOUROUMA TRANSPORT

Ву:			
Dy.			

		Title	

DATED:

COMMONWEALTH OF PENNSYLVANIA BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN RE: APPLICATION OF

:

DOCKET A-2015-2473517

LAYE KOUROUMA

:

(Electronically Filed)

T/A KOUROUMA TRANSPORT

T :

CERTIFICATE OF SERVICE

I hereby certify that I have this 24th day of April, 2015, served true copies of the First Set of Interrogatories of 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. Directed To Laye Kourouma t/a Kourouma Transport upon the participants listed below, in accordance with the requirements of 52 Pa. Code § 1.54.

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

Laye Kourouma, Owner
Laye Kourouma t/a Kourouma Transport
203 West Baltimore Avenue
Lansdowne, PA 19050
(Applicant)
(By e-Service: kouroumatransport@hotmail.com)

BARNETT SATINSKY, ESQUIRE

PA Attorney I.D. # 15767

CHRISTINE SOARES, ESQUIRE

PA Attorney I.D. # 203497

FOX ROTHSCHILD LLP

2000 Market Street, 20th Floor

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Attorneys 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.



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Barnett Satinsky

Direct Dial: (215) 299-2088

Internet Address: bsatinsky@foxrothschild.com

April 24, 2015

VIA ELECTRONIC FILING

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

Re:

Application of Laye Kourouma t/a Kourouma Transport

Docket Number: A-2015-2473517

Dear Secretary Chiavetta:

Enclosed for filing is the Certificate of Service pertaining to service of the First Set of Interrogatories of 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., upon the Applicant in the above matter.

Thank you for your cooperation.

Very truly yours,

Barnett Satinsky

BS:lwh Enclosure

cc:

Laye Kourouma (Owner/Applicant) (w/encl.)

(via e-Service: kouroumatransport@hotmail.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

Florida

COMMONWEALTH OF PENNSYLVANIA BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN RE: APPLICATION OF

DOCKET A-2015-2473517

LAYE KOUROUMA

.

(Electronically Filed)

T/A KOUROUMA TRANSPORT

CERTIFICATE OF SERVICE

I hereby certify that I have this 24th day of April, 2015, served true copies of the First Set of Interrogatories of 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. Directed To Laye Kourouma t/a Kourouma Transport upon the participants listed below, in accordance with the requirements of 52 Pa. Code § 1.54.

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

Laye Kourouma, Owner
Laye Kourouma t/a Kourouma Transport
203 West Baltimore Avenue
Lansdowne, PA 19050
(Applicant)
(By e-Service: kouroumatransport@hotmail.com)

BARNETT SATINSKY, ESQUIRE

PA Attorney I.D. # 15767

CHRISTINE SOARES, ESQUIRE

PA Attorney I.D. # 203497

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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.

Satinsky, Barnett

From:

eFile@pa.gov

Sent:

Friday, April 24, 2015 12:00 PM

To: Cc: Satinsky, Barnett Hoffman, Lisa W.

Subject:

E-file Confirmation for 1589237

Importance:

High

Dear Barnett Satinsky,

Your eFiling has been successfully filed on Fri Apr 24 10:42:18 EDT 2015. You may view this Filing at

<u>Certificate of Service - Suburban Transit Network et al</u> and the Case details are: {DocketNumber=A-2015-2473517, Bp8CaseID=2473517}

Thank You, Public Utility Commission Commonwealth of Pennsylvania

^{*} Please do not respond to this automatically generated email.



Satinsky, Barnett

From:

Satinsky, Barnett

Sent:

Friday, April 24, 2015 11:03 AM

To:

'kouroumatransport@hotmail.com'

Cc:

Soares, Christine

Subject:

Application of Laye Kourourma, A-2015-2473517

Attachments:

29827862_1_Letter to L. Kourourma enclosing First Set of Interrogatories of Joint Protestants.PDF; 29827714_1_e-filing transmission slip from PUC re_ First Set of Interrogs. (No. A-2015-2473517).PDF; 29827602_1_Letter to Secretary Chiavetta

enclosing Certificate of Service re First Set of Interrogs..PDF

Mr. Kourouma,

Attached are your copies of Joint Protestants' First Set of Interrogatories directed to you together with an explanatory cover letter, as well as a Certificate of Service and proof of filing of the Certificate with the PUC.

Very truly,

Barnett Satinsky

Barnett Satinsky

Partner

Fox Rothschild LLP

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Philadelphia, PA 19103-3222

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