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June 10, 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 Stipulation 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.

Thank you for your cooperation.

Christine Stars

Very truly yours,

**Christine Soares** 

CS

Enclosure

cc: Laye Kourouma (w/encl.) (via e-Service: kouroumatransport@hotmail.com)

Charles E. Thomas, III, Esquire (w/encl.) (via e-Service: cet3@tntlawfirm.com)

Barnett Satinsky, Esquire (w/encl.) (via email)

# COMMONWEALTH OF PENNSYLVANIA BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN RE: APPLICATION OF

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**DOCKET A-2015-2473517** 

LAYE KOUROUMA

ROUMA

T/A KOUROUMA TRANSPORT

STIPULATION 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.

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. ("Joint Protestants"), by their attorneys, hereby file this stipulation and aver as follows:

- 1. On June 4, 2014, Applicant Laye Kourouma t/a Kourouma Transport and Protestant Rover Community Transport, Inc. entered into a Restrictive Amendment ("Restrictive Amendment"). A copy of the Restrictive Amendment as filed with the Pennsylvania Public Utility Commission ("Commission") is attached as Exhibit "A".
- 2. Under the Restrictive Amendment, the Application was amended so that the authority sought shall read as follows:

To transport, as a common carrier, by motor vehicle, persons in paratransit service, from points in the City and County of Philadelphia and the County of Delaware, to points in Pennsylvania, and return.

3. Based upon the approval of the Restrictive Amendment, and conditioned upon its acceptance by the Commission and any Order issued being consistent therewith, Joint Protestants agree to withdraw their Protest to the Application as amended.

- 4. Joint Protestants desire to remain a party of record to receive copies of any orders issued by the Commission in the proceeding.
- 5. If the Restrictive Amendment is not accepted by the Commission, Joint Protestants reserve the right to present evidence in opposition to approval of the Application at an evidentiary hearing.

Respectfully submitted,

Christini Avars

BARNETT SATINSKY, ESQUIRE
CHRISTINE SOARES, ESQUIRE
FOX ROTHSCHILD LLP
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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 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: June 10, 2015

### EXHIBIT A



CHARLES E. THOMAS, III Direct Dial: 717.255.7611 cet3@tntlawfirm.com

June 8, 2015

Via Electronic Filing

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

In re: Application of Laye Kourouma t/a Kourouma Transport

Docket No. A-2015-2473517

Dear Secretary Chiavetta:

Enclosed for filing is a Restrictive Amendment entered into by Applicant Laye Kourouma t/a Kourouma Transport and Protestant Rover Community Transportation, Inc. in the above-referenced matter. Copies of the Restrictive Amendment are being served upon the persons and in the manner set forth in the certificate of service attached to it.

Should you have any questions or require additional information, please do not hesitate to contact me.

Very truly yours,

THOMAS, NIESEN & THOMAS, LLC

ву

Charles E. Thomas, III

Enclosure

cc:

Certificate of Service (w/encl.)

Dale N. Krapf (w/encl.)
Gary D. Krapf (w/encl.)

## Before the PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Laye Kourouma t/a

Docket No. A-2015-2473517

Kourouma Transport

:

#### RESTRICTIVE AMENDMENT

AND NOW, come Laye Kourouma t/a Kourouma Transport (hereinafter "Applicant") and Rover Community Transportation, Inc. (hereinafter "Protestant"), by its attorney, and file this Restrictive Amendment as follows:

1. The above-captioned Application is hereby amended so that the authority sought shall read as follows:

To transport, as a common carrier, by motor vehicle, persons in paratransit service, from points in the City and County of Philadelphia and the County of Delaware, to points in Pennsylvania, and return.

- 2. Based upon the Restrictive Amendment set forth in Paragraph 1 above, and conditioned upon its acceptance by the Pennsylvania Public Utility Commission ("Commission") and any order issued being consistent therewith, Protestant agrees to withdraw its Protest to the Application as amended. Protestant desires to remain a party of record so as to receive copies of any orders issued by the Commission in the proceeding.
- 3. If the Restrictive Amendment is not accepted by the Commission, the parties agree that further hearings shall be held to permit Protestant to present evidence in opposition to approval of the Application.

WHEREFORE, the parties, intending to be legally bound, have hereunto set their hands and seals as of this \_\_4 \_\_day of June, 2015.

ROVER COMMUNITY TRANSPORTATION, INC.

Charles E. Thomas, III, Esq. PA Attorney ID # 201014

THOMAS, NIESEN & THOMAS, LLC 212 Locust Street, Suite 600 Harrisburg, PA 17101

Attorney for Protestant Rover Community Transportation, Inc. LAYE KOUROUMA T/A KOUROUMA TRANSPORT

By\_

Laye Kourouma
203 West Baltimore Avenue
Lansdowne, PA 19050

**Applicant** 

## Before the PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Laye Kourouma t/a Kourouma Transport

Docket No. A-2015-2473517

#### **CERTIFICATE OF SERVICE**

I hereby certify that I have this 8<sup>th</sup> day of June, 2015, served a true and correct copy of the foregoing Restrictive Amendment, upon the parties and in the manner listed below in accordance with the requirements of 52 Pa. Code § 1.54:

#### VIA E-MAIL/E-SERVICE

Laye Kourouma, Owner
Laye Kourouma t/a Kourouma Transport
203 West Baltimore Avenue
Lansdowne, PA 19050
kouroumatransport@hotmail.com

Barnett Satinsky, Esq. Christine Soares, Esq. Fox Rothschild LLP 2000 Market Street, 20<sup>th</sup> Floor Philadelphia, PA 19103-3222 bsatinsky@foxrothschild.com csoares@foxrothschild.com

> Charles E. Thomas, III PA Attorney ID # 201014



# PENNSYLVANIA PUBLIC UTILITY COMMISSION

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#### <u>Uploaded File List</u>

File Name	Document Class	Document Type
150608 Restrictive Amendment - Kourouma Transport Rover Community Transportation.pdf	Supporting Documentation	Application Updates/Revisions

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#### **CERTIFICATE OF SERVICE**

I hereby certify that I have on this day served a true copy of the Stipulation of Joint Protestants Suburban Network Transit, 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 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)

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)

Christine Loans
CHRISTINE SOARES, ESQUIRE

Dated: June 10, 2015