

# PAGE, WOLFBERG & WIRTH LLC

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June 24, 2015

VIA CERTIFIED MAIL No. 7014 2870 0001 7617 7756

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

RECEIVED

JUN 24 2015

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Re: Application of Leon Earle Saucier;  
Docket No. A-2015-2475065

Dear Secretary Chiavetta:

Enclosed are an original and four copies of a Restrictive Amendment and Stipulation for the above-captioned matter, which have been executed by: (1) the Applicant, Leon Earle Saucier; and (2) me (Christina M. Mellott, Esquire of Page, Wolfberg & Wirth, LLC), as counsel for the Protestants, Ephrata Community Ambulance Association, Inc., and Manheim Township Ambulance Association t/a Central Lancaster Medical Transport Service.

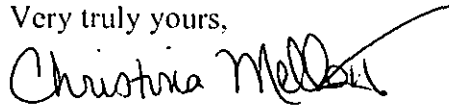
This Restrictive Amendment and Stipulation has been executed on behalf of the Applicant and the only two Protestants (of which I am aware) in the above-captioned matter. So, the adoption in full of the restrictive language in the attached Restrictive Amendment and Stipulation will withdraw the Protests of all Protestants in this matter. However, the Protestants, as indicated in the Restrictive Amendment and Stipulation, do wish to remain parties of record for purposes of receiving all notices and orders issues in this proceeding. Kindly date-stamp and return a copy of the Restrictive Amendment and Stipulation to me.

June 24, 2015

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Thank you for your attention to this matter.

Very truly yours,



Christina M. Mellott

for PAGE, WOLFBERG & WIRTH, LLC

CMM:ms

Enclosures

cc: Leon Earle Saucier (*via first class mail*)  
Ephrata Community Ambulance Association, Inc. (*via e-mail*)  
Manheim Township Ambulance Association t/a Central Lancaster Medical  
Transport Service (*via e-mail*)

Before the  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED

Application of  
LEON EARLE SAUCIER  
DOCKET NO. A-2015-2475065

JUN 24 2015

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**RESTRICTIVE AMENDMENT AND STIPULATION**

In accordance with the Rules of Practice of the Pennsylvania Public Utility Commission (“Commission”), Applicant, **Leon Earle Saucier** (“Applicant”); and Protestants, **Ephrata Community Ambulance Association, Inc., and Manheim Township Ambulance Association t/a Central Lancaster Medical Transport Service**, by and through their undersigned counsel, (collectively referred to in this Agreement as “Protestants”), hereby agree to and enter into this Restrictive Amendment and Stipulation as follows:

1. Applicant hereby restrictively amends its Application before the Pennsylvania Public Utility Commission to read as follows:

For the right to transport, as a common carrier, by motor vehicle, persons in paratransit service, limited to persons whose personal convictions prevent them from owning or operating motor vehicles, from points in Lancaster County, to *points in Pennsylvania and return.*

2. Based on the foregoing Restrictive Amendment, and conditioned upon its acceptance by the Commission, and also upon every Order and grant being consistent with this Restrictive Amendment and Stipulation, the Protestants have agreed to and do, upon complete execution of this Restrictive Amendment and Stipulation, withdraw their Protests, subject to the following two conditions and requirements: (i) in the event that any aspect of this Restrictive Amendment and Stipulation is rejected by the Commission for any reason whatsoever, the Protest of the Protestants shall be deemed immediately reinstated, and (ii) in the event that any aspect of this Restrictive Amendment and Stipulation is rejected by the Commission for any reason, the Protestants shall have the right to request reconsideration before the Commission

and/or to appeal before any and all appropriate courts, and in any such proceedings Applicant shall not raise any objection as to party status and/or standing of Protestants in such proceedings.

3. Protestants shall remain a party of record for the purpose of receiving copies of Orders issued by the Commission regardless of the acceptance or denial by the Commission of this Restrictive Amendment and Stipulation.

WHEREFORE, in consideration of the promises mutually set forth above, the parties hereto have executed this Restrictive Amendment and Stipulation this 24<sup>th</sup> day of June, 2015.

EPHRATA COMMUNITY AMBULANCE  
ASSOCIATION, INC.; and MANHEIM  
TOWNSHIP AMBULANCE ASSOCIATION  
t/a CENTRAL LANCASTER MEDICAL  
TRANSPORT SERVICE

LEON EARLE SAUCIER

BY Christina M. Mellott  
CHRISTINA M. MELLOTT, ESQ.  
PAGE, WOLFBERG & WIRTH, LLC  
Attorney for Protestants, Ephrata  
Community Ambulance Association, Inc.;  
and Manheim Township Ambulance  
Association t/a Central Lancaster Medical  
Transport Service

BY Leon Earle Saucier  
Leon Earle Saucier  
Applicant

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Page, Wolfberg & Wirth, LLC  
5010 E. Trindle Rd.  
Suite 202  
Mechanicsburg, PA 17050

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE.  
**CERTIFIED MAIL**



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SECRETARY'S BUREAU

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Pennsylvania Public Utility Commission  
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