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July 28, 2015

VIA ELECTRONIC FILING

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

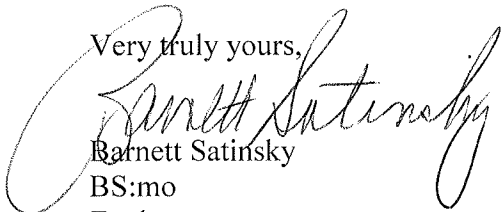
Re: Application of Safety First Ambulance, LLC
Docket Number: A-2015-2472256

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 in the above matter.

Thank you for your cooperation.

Very truly yours,



Barnett Satinsky

BS:mo

Enclosure

cc: Cynthia W. Fordham, ALJ (w/encl.) *(via first class mail and email)*
Ms. Irina Kourinnoi *(Secretary/Applicant) (w/encl.)*
(via e-Service: rkourinnoi@safetyfirstems.org)
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**

**IN RE: APPLICATION OF : DOCKET A-2015-2472256
SAFETY FIRST :
AMBULANCE, LLC :** **(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 directed to Safety First Ambulance, LLC, 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:

Safety First Ambulance, LLC
(hereinafter referred to as "Safety First" or "Applicant")
P. O. Box 18107
Philadelphia, Philadelphia County, PA 19116

Docket number A-2015-2472256

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. 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 – 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. Safety First filed with the Pennsylvania Public Utility Commission (the “Commission”) an application for approval to begin operating as a common carrier for transportation of persons in paratransit service, utilizing wheelchair vans, between points in Bucks, Delaware and Montgomery Counties.

6. Notice of the application was published in the Pennsylvania Bulletin dated April 11, 2015.

7. Protests to the application were due on or before April 27, 2015.

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

9. On April 20, 2015, Joint Protestants e-served to Safety First their First Set of Interrogatories.

10. Applicant failed to provide answers to Joint Protestants’ First Set of Interrogatories.

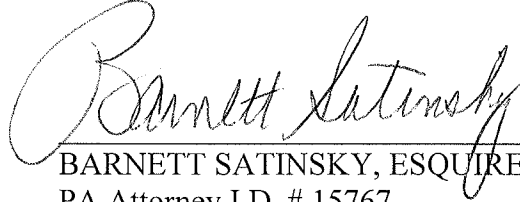
11. The instant Application was assigned to Administrative Law Judge Cynthia W. Fordham, who by Prehearing Order and Order Granting Motion to Compel dated July 16, 2015 (the “July 16, 2015 Order”) (a) directed that the Applicant have counsel file a notice of appearance by July 27, 2015 and (b) ordered that the Applicant respond to the Joint Protestants’ First Set of Interrogatories and Document Requests on or before July 27, 2015.

12. Applicant has failed to comply with the July 16, 2015 Order.

13. Joint Protestants are unable to properly prepare for hearing without the benefit of complete answers to the discovery which has been propounded, and Applicant cannot proceed to hearing in a contested proceeding without having counsel represent it.

WHEREFORE, Joint Protestants TransNet, Bux-Mont, ECC, Tri County, and BCT respectfully request an Order dismissing the Application of Safety First Ambulance LLC.

Respectfully submitted,



BARNETT SATINSKY, ESQUIRE
PA Attorney I.D. # 15767
CHRISTINE SOARES, ESQUIRE
PA Attorney I.D. # 203497
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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.*

July 28, 2015

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

IN RE: APPLICATION OF : **DOCKET A-2015-2472256**
SAFETY FIRST AMBULANCE, LLC : **(Electronically Filed)**

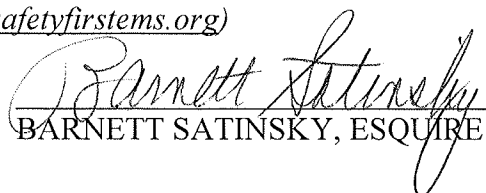
CERTIFICATE OF SERVICE

I hereby certify that I have on this 28th day of July, 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)

Cynthia W. Fordham, Administrative Law Judge
Pennsylvania Public Utility Commission
801 Market Street, Suite 4063
Philadelphia, PA 19107
(By First Class Mail, Postage Prepaid and email)

Ms. Irina Kourinnoi
Safety First Ambulance, LLC
85 Tomlinson Road
Unit G
Huntingdon Valley, PA 19006
(Secretary/Applicant)
(By e-Service: rkourinnoi@safetyfirstems.org)


BARNETT SATINSKY, ESQUIRE