

Law Offices

VUONO & GRAY, LLC

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December 31, 2015

RECEIVED

Re: Veteran Transportation Management, LLC
Docket No. C-2015-2507335
Our File 5722-1

DEC 31 2015

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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

MAILED WITH U.S. POSTAL SERVICE
CERTIFICATE OF MAILING FORM 3817

Dear Secretary Chiavetta:

We enclose for filing the original and two copies of an Answer to Complaint in connection with the above-captioned proceeding.

Please acknowledge receipt and filing of the enclosed on the duplicate copy of this letter of transmittal and return it to the undersigned in the self-addressed, stamped envelope provided.

Very truly yours,

VUONO & GRAY, LLC

William A. Gray

as/158895

Enclosures

cc: Veteran Transportation Management, LLC

RECEIVED

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DEC 31 2015

PENNSYLVANIA PUBLIC UTILITY
COMMISSION, BUREAU OF
TRANSPORTATION AND SAFETY

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

V.

Docket No. C-2015-2507335

VETERAN TRANSPORTATION
MANAGEMENT, LLC

ANSWER TO COMPLAINT

AND NOW, Comes the Respondent, Veteran Transportation Management, LLC,
by and through its attorneys, Vuono & Gray, LLC, and files the following Answer to
Complaint:

1. Respondent is without sufficient information to admit or deny the averments and strict proof demanded at the hearing.
2. The averments of Paragraph 2 are denied. On the contrary, Respondent is no longer located at 801 Bingham Street, Pittsburgh, PA 15203, but rather is located at 8541 Peters Road, Unit 2, Cranberry Township, PA 16066.
3. The averments of Paragraph 3 are admitted.
4. The averments of Paragraph 4 are denied.
5. The averments of Paragraph 5 are conclusions of law to which no response is required. To the extent that a response is required, the averments are specifically denied.

NEW MATTER

6. Respondent's surety bond was originally for a term of one year, but was continued for an additional year by continuation certificate dated August 31, 2015, a copy of which is attached hereto as Exhibit "A". Respondent did not receive any notices from the Public Utility Commission indicating that its surety bond had terminated since any notices would have been sent to its old address at 801 Bingham Street, Pittsburgh, PA 15203. If any such notices were sent by the Public Utility Commission, they were not forwarded to Respondent.

WHEREFORE, Respondent requests that the Complaint be dismissed.

Respectfully submitted,

VUONO & GRAY, LLC

By: _____

William A. Gray, Esq.

Attorney for

Veteran Transportation Management, LLC

Respondent

VUONO & GRAY, LLC
310 Grant Street
Suite 2310 Grant Building
Pittsburgh, PA 15219
(412) 471-1800

RECEIVED

Dated: December 31, 2015

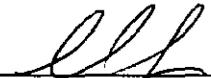
DEC 31 2015

/158783

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

VERIFICATION

I verify that the statements made in the foregoing document are true and correct to the best of my knowledge, information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsification to authorities.



Derek A. DeLuca, President

Dated: 12/30/15

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DEC 31 2015

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



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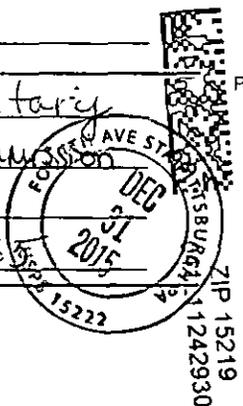
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From: Vuono & Gray, LLC
310 Grant Street, Suite 2310
Pittsburgh PA 15219-2383
Re: _____

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

PS Form **3817**, April 2007 PSN 7530-02-000-9065

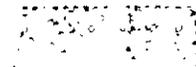


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Law Offices

VUONO & GRAY, LLC

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Pittsburgh, PA 15219-2388

TO:

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