

Law Offices

VUONO & GRAY, LLC

John A. Vuono
William A. Gray
Mark T. Vuono*
Dennis J. Kusturias
Christine M. Dolfi
Louise R. Schrage
*Also Admitted in Florida

2310 Grant Building
Pittsburgh, PA 15219-2383
(412) 471-1800

Richard R. Wilson
of Counsel

Facsimile
(412) 471-4477

December 9, 2002

Re: Cranberry Limousine Services, Inc.
Docket No. A-00114985, F.2

Cranberry Limousine Services, Inc.
133 Glenbrook Drive
Cranberry Township, PA 16066

Dear Sir or Madam:

We have still not received from you your answers to our Interrogatories, which are substantially overdue. If we do not receive these answers to Interrogatories by the close of business on Tuesday, December 17, we intend to file a Motion for Sanctions.

Very truly yours,

VUONO & GRAY, LLC

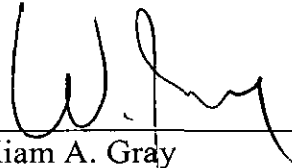
William A. Gray

pz/23295

cc: Kirk Livery, Inc.
Star Limousine Services, Inc.
System of Services, Inc. t/d/b/a Fantasy Limo Leasing

CERTIFICATE OF SERVICE

William A. Gray, attorney for Protestants, hereby certifies that on the 19th day of December, 2002 he did serve the original and two (2) true and correct copies of the foregoing Motion for Sanctions upon applicant at 133 Glenbrook Drive, Cranberry Township, PA 16066.



William A. Gray



COMMONWEALTH OF PENNSYLVANIA
 PENNSYLVANIA PUBLIC UTILITY COMMISSION
 1103 PITTSBURGH STATE OFFICE BUILDING
 300 LIBERTY AVENUE
 PITTSBURGH, PENNSYLVANIA 15222-1210

Telephone: 412 565-3550
 Fax: 412 565-5692

IN REPLY PLEASE
 REFER TO OUR FILE

December 18, 2002

Pamela L. Leyden, Esq.
 Dickie, McCamey & Chilcote, PC
 Two PPG Place, Suite 400
 Pittsburgh, PA 15222

DOCKETED

JAN 09 2003

RECEIVED
 2002 DEC 23 AM 9:32
 PA PUC
 SECRETARY'S BUREAU

Re: Application of Cranberry Limousine Services, Inc.
 Docket No. A-00114985F0002

Dear Ms. Leyden:

I am writing to ask whether you have a current address for Cranberry Limousine Services, Inc. You were listed as an incorporator in the 1997 incorporation filing. Would it be appropriate to serve a prehearing order on you for the initial hearing scheduled for January 28, 2003?

Sincerely,

Michael A. Nemecek
 Administrative Law Judge

MAN:seo

cc: William A. Gray, Esq.
 Vuono & Gray, LLC
 2310 Grant Building
 Pittsburgh, PA 15219

File Room

DOCUMENT

SRB

Law Offices

VUONO & GRAY, LLC

John A. Vuono
William A. Gray
Mark T. Vuono*
Dennis J. Kusturiss
Christine M. Dolfi
Louise R. Schrage
*Also Admitted in Florida

2310 Grant Building
Pittsburgh, PA 15219-2383
(412) 471-1800

Richard R. Wilson
of Counsel

Facsimile
(412) 471-4477

December 19, 2002

Re: Cranberry Limousine Service, Inc.
Docket No. A-00114985, F. 2

ORIGINAL

Mr. James J. McNulty
Secretary
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265

DOCUMENT

Dear Mr. McNulty:

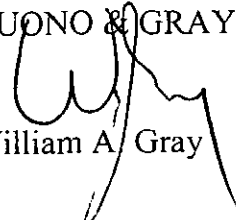
We enclose for filing with the Commission a Motion for Sanctions in connection with the above-captioned application proceeding. We are serving a copy of the Motion for Sanctions on the applicant.

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



RECEIVED

DEC 19 2002

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

pz/24033

Enclosure

cc: Honorable Michael A. Nemeo (w/enc.)
Cranberry Limousine Service, Inc. (w/enc.)
Kirk Livery, Inc.
Star Limousine Services, Inc.
System of Services, Inc. t/d/b/a Fantasy Limo Leasing

SRR

86

ORIGINAL

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKETED

JAN 09 2003

DOCKET NO. A-00114985, F. 2

RECEIVED

DEC 19 2002

CRANBERRY LIMOUSINE SERVICE, INC.

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

MOTION FOR SANCTIONS

DOCUMENT

Kirk Livery, Inc., Star Limousine Services, Inc. and System of Services, Inc.

t/d/b/a Fantasy Limo Leasing (Protestants), by their counsel, Vuono & Gray, LLC,
submit this Motion for Sanctions and request the Commission to issue an order imposing
sanctions against the applicant for failure to answer Interrogatories filed by the
protestants. In support of the Motion, protestants submit as follows:

1. Protestants served Interrogatories on the applicant on October 1, 2002, as set
forth in the Certificate of Service filed with the Commission, which is attached to this
Motion as Appendix 1.

2. Protestants' Interrogatories requested information pertinent to the issues of
fitness and need for service. A copy of protestants' Interrogatories are attached to this
Motion as Appendix 2.

3. Protestants' Interrogatories demanded that the applicant file and serve full and complete written answers to each interrogatory within twenty (20) days after the date of service pursuant to 52 Pa. Code §5.342.

4. The applicant has not provided answers to the Interrogatories attached hereto as of this date.

5. Protestants' counsel sent a letter to the applicant dated November 21, 2002 indicating that answers to Interrogatories were overdue and requesting that the answers to Interrogatories be provided. A copy of this letter is attached to this Motion as Appendix 3.

6. Protestants' counsel sent a letter to the applicant dated December 9, 2002 indicating that answers to Interrogatories were overdue and requesting that the answers to Interrogatories be provided by December 17 or a Motion for Sanctions would be filed. A copy of this letter is attached to this Motion as Appendix 4.

7. A hearing has been scheduled in connection with this application for January 28, 2003, in Pittsburgh, PA.

8. The information requested in the Interrogatories is sought to be discovered in order to permit the protestants to prepare for the hearings and to properly cross-examine witnesses for the applicant.

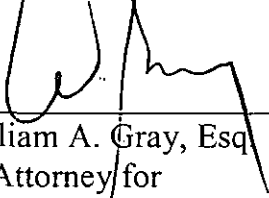
9. This Motion is being presented pursuant to 52 Pa. Code §5.371 and the sanctions requested are of the type set forth in 52 Pa. Code §5.372. Specifically, the protestants request that the application be dismissed, or, in the alternative, that the applicant be prohibited from introducing any evidence involving matters which are the

subject of the protestants' Interrogatories; that the applicant be prohibited from introducing any exhibits; that the applicant be prohibited from presenting any public witnesses because of its failure to identify those witnesses; and that other appropriate relief be granted.

Respectfully submitted,

VUONO & GRAY, LLC

By: _____


William A. Gray, Esq
Attorney for
Kirk Livery, Inc.
Star Limousine Services, Inc.
System of Services, Inc. t/d/b/a
Fantasy Limo Leasing

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

Dated: December 19, 2002

/24033

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

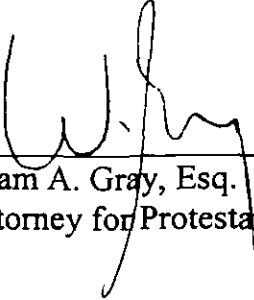
RECEIVED
DEC 19 2002

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

IN RE:)
Application of) Docket No. A-00114985, F. 2
CRANBERRY LIMOUSINE SERVICES, INC.)

CERTIFICATE OF SERVICE

William A. Gray, attorney for Protestants, Kirk Livery, Inc., Star Limousine Services, Inc. and System of Services, Inc. t/d/b/a Fantasy Limo Leasing, hereby certifies that on the 1st day of October, 2002 he did serve the original and two (2) true and correct copies of the foregoing Interrogatories upon the applicant, Cranberry Limousine Services, Inc., 133 Glenbrook Drive, Cranberry Township, PA 16066, by certified mail, postage prepaid.



William A. Gray, Esq.
Attorney for Protestants

VUONO & GRAY, LLC
2310 Grant Building
310 Grant Street
Pittsburgh, PA 15219

/23040

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED
DEC 19 2002
PENNSYLVANIA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

IN RE:)
Application of) Docket No. A-00114985, F. 2
CRANBERRY LIMOUSINE SERVICES, INC.)

INTERROGATORIES DIRECTED TO THE APPLICANT

Protestants, Kirk Livery, Inc., Star Limousine Services, Inc. and System of Services, Inc. t/d/b/a Fantasy Limo Leasing, by their attorneys, submit the following Interrogatories to Cranberry Limousine Services, Inc. ("Applicant") and demand that the Applicant file and serve full and complete written answers to each Interrogatory under oath with twenty (20) days after the date of the service hereof pursuant to 52 Pa. Code §5.342.

The request for information, as set forth in these Interrogatories, shall be of a continuing nature, with the understanding that it shall be the responsibility of Applicant to furnish updated responses to the questions herein, up to and including the time at which the hearing on the merits of this case is held.

INTERROGATORIES

1. Identify each and every motor vehicle presently owned by the Applicant or leased by the Applicant from some other party which it proposes to use in providing the service sought by this application. For each vehicle, indicate the owner, the date of manufacture, serial number, seating capacity, type of vehicle, special features on the vehicle, and the date when the vehicle was acquired, either by purchase or lease, by the Applicant.

ANSWER:

2. Identify each instance where the Applicant transported persons in limousine service from January 1, 2000 to the present date where the trip originated in Butler County and was destined to a point in Pennsylvania, including another point in Butler County. For each such instance, provide the following information: party or parties transported; date of trip; origin of trip; destination of trip; number of vehicles used; identification of vehicles; and payment received.

ANSWER:

3. Identify each instance where the Applicant transported persons in limousine service from January 1, 2000 to the present date where the trip originated in Beaver County and was destined to a point in Pennsylvania, including another point in Beaver County. For each such instance, provide the following information: party or parties transported; date of trip; origin of trip; destination of trip; number of vehicles used; identification of vehicles; and payment received.

ANSWER:

4. Identify each instance where the Applicant transported persons in limousine service from January 1, 2000 to the present date where the trip originated in Allegheny County and was destined to a point in Pennsylvania, including another point in Allegheny County. For each such instance, provide the following information: party or parties transported; date of trip; origin of trip; destination of trip; number of vehicles used; identification of vehicles; and payment received.

ANSWER:

5. Identify each and every facility of the Applicant, or location where the Applicant domiciles equipment, which is intended to be utilized in performing service sought under this application.

ANSWER:

6. Identify the name and address of each witness Applicant expects to call in this case and provide the name of the company, group or entity the witness represents, if any, and the subject matter of his/her expected testimony, including any testimony pertaining to the Protestants herein.

ANSWER:

7. Identify each exhibit Applicant intends to offer into evidence in this case. Please attach to your answers copies of these exhibits.

ANSWER:

8. Identify each and every formal and/or informal complaint against the Applicant received from or filed with the Pennsylvania Public Utility Commission since January 1, 2000 and, for each complaint, state: Date of complaint; date of trip(s); origin of trip(s); destination of trip(s); and how the complaint was resolved. Please attach to your answers copies of each formal and/or informal complaint, any and all responses submitted by the Applicant, and any Orders or other documents issued by the Public Utility Commission relating to each formal and/or informal complaint.

ANSWER:

9. Is the Applicant affiliated in any way with any other entity licensed by the Public Utility Commission? If so, identify the entity and the affiliation.

ANSWER:

10. Identify each instance where the Applicant leased its equipment to some other person or entity from January 1, 2000 to the present date to provide limousine service within the territory sought by this application. For each such instance, provide the following information: person or entity to whom equipment was leased; date of trip; origin of trip; destination of trip; number of vehicles used; identification of vehicles; and payment received.

ANSWER:

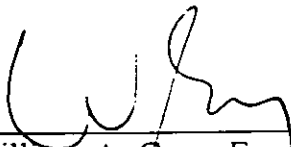
11. List the officers, directors and shareholders of the Applicant and identify the office held by each officer and the number of shares of stock owned by each shareholder.

ANSWER:

12. Attach to your answers, a copy of the application filed by the Applicant in this proceeding, including any attachments to the application.

ANSWER:

Dated: October 1, 2002

By: 
William A. Gray, Esq.
Attorney for Protestants

CRANBERRY LIMOUSINE
SERVICES, INC.

Dated: _____

By: _____

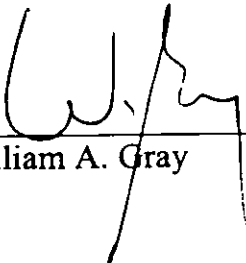
VERIFICATION

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.

Dated: _____

CERTIFICATE OF SERVICE

William A. Gray, attorney for Protestants, hereby certifies that on the 1st day of October, 2002 he did serve the original and two (2) true and correct copies of the foregoing Interrogatories upon applicant at 133 Glenbrook Drive, Cranberry Township, PA 16066.



William A. Gray

RECEIVED
DEC 19 2002
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Law Offices

VUONO & GRAY, LLC

John A. Vuono
William A. Gray
Mark T. Vuono*
Dennis J. Kusturiss
Christine M. Dolfi
Louise R. Schrage
*Also Admitted in Florida

2310 Grant Building
Pittsburgh, PA 15219-2383
(412) 471-1800

Richard R. Wilson
of Counsel

Facsimile
(412) 471-4477

November 21, 2002

Re: Cranberry Limousine Services, Inc.
Docket No. A-00114985, F.2

Cranberry Limousine Services, Inc.
133 Glenbrook Drive
Cranberry Township, PA 16066

Dear Sir or Madam:

We have still not received from you your answers to our Interrogatories, which are substantially overdue. Please provide us with these answers to Interrogatories as soon as possible or we will have no alternative but to file a Motion for Sanctions.

Very truly yours,

VUONO & GRAY, LLC

William A. Gray

pz/23295

cc: Kirk Livery, Inc.
Star Limousine Services, Inc.
System of Services, Inc. t/d/b/a Fantasy Limo Leasing

LEBOEUF, LAMB, GREENE & MACRAE
L.L.P.

A LIMITED LIABILITY PARTNERSHIP INCLUDING PROFESSIONAL CORPORATION S

NEW YORK
WASHINGTON, DC.
ALBANY
BOSTON
DENVER
HARRISBURG
HARTFORD
HOUSTON
JACKSONVILLE
LOS ANGELES
NEWARK
PITTSBURGH
SALT LAKE CITY
SAN FRANCISCO

ONE GATEWAY CENTER
420 FORT DUQUESNE BOULEVARD
SUITE 1600
PITTSBURGH, PA 15222-1437

(412) 594-2300

FACSIMILE: (412) 594-5237

E-MAIL ADDRESS: PAMELA.LEYDEN@LLGM.COM

WRITER'S DIRECT DIAL: (412) 594-2328

LONDON
(A LONDON-BASED
MULTINATIONAL PARTNERSHIP)

PARIS

BRUSSELS

JOHANNESBURG
(PTY) LTD.

MOSCOW

RIYADH
(AFFILIATED OFFICE)

TASHKENT

BISHKEK

ALMATY

BEIJING

December 23, 2002

Steve Springer
Public Utility Commission
State Office Building
300 Liberty Avenue
Pittsburgh, PA 15222

DOCKETED
FEB 13 2003

RECEIVED
OFFICE OF CALUL
02 DEC 30 AM 9:13
PA PUC

Re: Cranberry Limousine Services, Inc.

DOCUMENT

Dear Mr. Springer:

This will confirm my voicemail to you in which I informed you that I no longer represent Cranberry Limousine Services, Inc. I have no additional contact information. I would appreciate you removing me from the Service list for Action A-00114985F0002.

Thank you for your assistance.

Sincerely,


Pamela Lee Leyden

PLL:tb

cc: Bernard and Joann L. Petras
William A. Gray

OALJ Hearing Report

Please Check Those Blocks Which Apply

Docket No.:	A-00114985F0002		YES	NO
Case Name:	Application of Cranberry Limousine Services, Inc.	Prehearing Held:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Location:	Pittsburgh	Hearing Held:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Date:	January 28, 2003	Testimony Taken:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ALJ:	Michael A. Nemeo	Transcript Due:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Reporting Firm:	Commonwealth Reporting	Hearing Concluded:	<input type="checkbox"/>	<input type="checkbox"/>
		Further Hearing Needed:	<input type="checkbox"/>	<input type="checkbox"/>
		Estimated Add'l Days:		
		RECORD CLOSED:	<input type="checkbox"/>	<input type="checkbox"/>
		DATE:		
		Briefs to be Filed:	<input type="checkbox"/>	<input type="checkbox"/>
		DATE:		
		Bench Decision:	<input type="checkbox"/>	<input type="checkbox"/>
		REMARKS:	<i>Application dismissed by initial decision dated 1/14/03.</i>	

**DOCUMENT
FOLDER**

DOCKETED
FEB 06 2003

RECEIVED
OFFICE OF C. J.
03 FEB -4 PM 3:39
PA PUC

PLEASE PRINT CLEARLY - Incomplete Information may result in delay of processing.

Name and Telephone Number	Address	Who are you representing?
	<p>RECEIVED FEB 06 2003 PA PUBLIC UTILITIES COMMISSION SECRETARY'S BUREAU</p>	
Telephone:	E-mail Address:	Fax Number:
	City State Zip	
Telephone:	E-mail Address:	Fax Number:
	City State Zip	
Telephone:	E-mail Address:	Fax Number:
	City State Zip	

Check this box if additional parties or attendees appear on back of form.

Reporter's Signature

Note: Completion of this form does not constitute an entry of appearance, see 52 Pa. Code §§1.24 and 1.25.

Name and Telephone Number	Address			Who are you representing?
	City	State	Zip	
Telephone:	E-mail Address:			Fax Number:
	City	State	Zip	
Telephone:	E-mail Address:			Fax Number:
	City	State	Zip	
Telephone:	E-mail Address:			Fax Number:
	City	State	Zip	
Telephone:	E-mail Address:			Fax Number:
	City	State	Zip	
Telephone:	E-mail Address:			Fax Number:
	City	State	Zip	
Telephone:	E-mail Address:			Fax Number:
	City	State	Zip	
Telephone:	E-mail Address:			Fax Number:
	City	State	Zip	
Telephone:	E-mail Address:			Fax Number:

RECEIVED

Act 294

FEB 20 2003

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Case Identification:

A-00114985F0002; App. of
Cranberry Limousine Service,
Inc., for the right to begin
to transport, as a common
carrier, by motor vehicle,
persons in limousine service,
between points in the counties
of Allegheny, Beaver and
Butler

Initial Decision By:

ALJ Michael A. Nemec

Deadline for Return to OSA:

February 14, 2003

RECEIVED

This decision has not been reviewed by OSA.

FEB 04 2003

* * * * *

OFFICE OF SPECIAL ASSISTANTS

I want full Commission review of this decision.

Commissioner

Date

~~I do not want full Commission review of this decision.~~

Ben Thomas

FEB 3, 2003

Commissioner

Date

DOCUMENT
FOLDER

100
FEB 20 2003

Act 294

Case Identification:

A-00114985F0002; App. of Cranberry Limousine Service, Inc., for the right to begin to transport, as a common carrier, by motor vehicle, persons in limousine service, between points in the counties of Allegheny, Beaver and Butler

Initial Decision By:

ALJ Michael A. Nemeec

Deadline for Return to OSA:

February 14, 2003

RECEIVED

This decision has not been reviewed by OSA.

* * * * *

FEB 14 2003

OFFICE OF SPECIAL ASSISTANTS

I want full Commission review of this decision.

Commissioner

Date

I do not want full Commission review of this decision.

Robert K. Bloom /rk

Commissioner

2/13/03

Date

3

Case Identification:

A-00114985F0002; App. of Cranberry Limousine Service, Inc., for the right to begin to transport, as a common carrier, by motor vehicle, persons in limousine service, between points in the counties of Allegheny, Beaver and Butler

Initial Decision By:

ALJ Michael A. Nemeec

Deadline for Return to OSA:

February 14, 2003

RECEIVED

This decision has not been reviewed by OSA.

FEB 10 2003

* * * * *

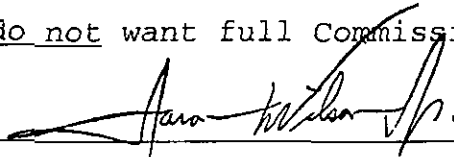
OFFICE OF SPECIAL ASSISTANTS

I want full Commission review of this decision.


Commissioner

Date

I do not want full Commission review of this decision.



Commissioner

2/10/03 

Date

Act 294

Case Identification:

A-00114985F0002; App. of Cranberry Limousine Service, Inc., for the right to begin to transport, as a common carrier, by motor vehicle, persons in limousine service, between points in the counties of Allegheny, Beaver and Butler

Initial Decision By:

ALJ Michael A. Nemeec

Deadline for Return to OSA:

February 14, 2003

RECEIVED

This decision has not been reviewed by OSA.

FEB 12 2003

* * * * *

OFFICE OF SPECIAL ASSISTANTS

I want full Commission review of this decision.

Commissioner

Date

I do not want full Commission review of this decision.

Terrance J. Fitzpatrick

Commissioner

2-11-03

Date

Act 294

Case Identification:

A-00114985F0002; App. of Cranberry Limousine Service, Inc., for the right to begin to transport, as a common carrier, by motor vehicle, persons in limousine service, between points in the counties of Allegheny, Beaver and Butler

Initial Decision By:

ALJ Michael A. Nemeec

Deadline for Return to OSA:

February 14, 2003

RECEIVED

This decision has not been reviewed by OSA.

FEB 14 2003

* * * * *

OFFICE OF SPECIAL ASSISTANTS

I want full Commission review of this decision.

Commissioner

Date

I do not want full Commission review of this decision.

✓ Kim Fitzgerald
Commissioner

2/14/03
Date