



THOMAS, NIESEN & THOMAS, LLC

*Attorneys and Counsellors at Law*

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

May 27, 2016

*Via Electronic Filing*

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

Re: Application of Metro Transportation, LLC  
Docket No. A-2015-2520130

Dear Secretary Chiavetta:

Enclosed for filing is the Restrictive Amendment between Applicant, Metro Transportation, LLC, and Protestants, Erie Transportation Services, Inc. t/d/b/a Erie Yellow Cab, Reading City Cab, LLC, Amigo Cab, LLC, Express Taxi, LLC, Reading Yellow Cab, Inc., Reading Check Cab, Inc., and Reading Metro Taxi Cab, Inc., in the above-referenced matter. Copies of the Restrictive Amendment are being served in accordance with the certificate of service attached to it.

Should you have any questions, please do not hesitate to contact me.

Very truly yours,

THOMAS, NIESEN & THOMAS, LLC

By 

Charles E. Thomas, III

Enclosure

cc: Certificate of Service (w/encl.)  
Kusa Tolla (w/encl.) (via email)

**Before the  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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Application of Metro Transportation, LLC : Docket No. A-2015-2520130

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**RESTRICTIVE AMENDMENT AND STIPULATION**

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AND NOW, come the Applicant, Metro Transportation, LLC, by and through its attorney, and Protestants, Erie Transportation Services, Inc. t/d/b/a Erie Yellow Cab, Reading City Cab, LLC, Amigo Cab, LLC, Express Taxi, LLC, Reading Yellow Cab, Inc., Reading Check Cab, Inc., and Reading Metro Taxi Cab, Inc. (collectively "Protestants"), by and through their respective attorneys, and file this Restrictive Amendment and Stipulation as follows:

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

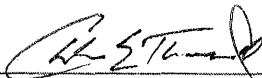
To transport, as a common carrier, by motor vehicle, persons upon call or demand in the City of Allentown, Lehigh County.

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, Protestants agree to withdraw their respective Protests to the Application as amended. Protestants desire to remain parties 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 Protestants 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 25th day of May, 2016.

**METRO TRANSPORTATION, LLC**

By   
Charles E. Thomas, III, Esquire  
THOMAS, NIESEN & THOMAS, LLC  
212 Locust Street, Suite 600  
Harrisburg, PA 17101

*Attorney for Applicant  
Metro Transportation, LLC*

**ERIE TRANSPORTATION SERVICES,  
INC. T/D/B/A ERIE YELLOW CAB**

By   
Paul S. Guarnieri, Esquire  
Malone Middleman, P.C.  
11676 Perry Highway, Suite 3100  
Wexford, PA 15090

*Attorney for Protestant Erie Transportation  
Services, Inc. t/d/b/a Erie Yellow Cab*

**READING YELLOW CAB, INC.,  
READING CHECKER CAB, INC., and  
READING METRO TAXI CAB, INC.**

By \_\_\_\_\_  
Stephen G. Welz, Esquire  
Law Offices of Stephen G. Welz, P.C.  
999 Berkshire Blvd., Suite 290  
Wyomissing, PA 19610-1254

*Attorney for Protestants Reading Yellow  
Cab, Inc., Reading Checker Cab, Inc., and  
Reading Metro Taxi Cab, Inc.*

**READING CITY CAB LLC,  
AMIGO CAB, LLC, and  
EXPRESS TAXI, LLC**

By \_\_\_\_\_  
John W. Sweet, Esquire  
The Sweet Firm  
620 S. 13th Street  
Harrisburg, PA 17104

*Attorney for Protestants Reading City Cab  
LLC, Amigo Cab, LLC, and Express Taxi,  
LLC*


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*Attorney for Applicant  
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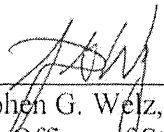
*Attorney for Applicant  
Metro Transportation, LLC*

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*Attorney for Protestants Reading City Cab  
LLC, Amigo Cab, LLC, and Express Taxi,  
LLC*

Application of Metro Transportation, LLC

Docket No. A-2015-2520130

**CERTIFICATE OF SERVICE**

I hereby certify that I have this 27<sup>th</sup> day of May, 2016, served a true and correct copy of the foregoing document upon the parties and in the manner listed below in accordance with the requirements of 52 Pa. Code § 1.54:

**VIA EMAIL AND FIRST CLASS MAIL**

Honorable Elizabeth H. Barnes  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
[ebarnes@pa.gov](mailto:ebarnes@pa.gov)

Stephen G. Welz, Esq.  
Law Offices of Stephen G. Welz, P.C.  
999 Berkshire Blvd., Suite 290  
Wyomissing, PA 19610-1254  
[sgwelz@welzlaw.com](mailto:sgwelz@welzlaw.com)


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Malone Middleman, P.C.  
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Wexford, PA 15090  
[guarneri@mlmpclaw.com](mailto:guarneri@mlmpclaw.com)

John W. Sweet, Esq.  
The Sweet Firm  
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Harrisburg, PA 17104  
[john@sweetfirm.com](mailto:john@sweetfirm.com)

Gulam Jaffer, President  
Yourway Transport, Inc.  
6681 Snowdrift Road  
Allentown, PA 18106  
[jaffer@yourwaytransport.com](mailto:jaffer@yourwaytransport.com)

**VIA FIRST CLASS MAIL**

Ayal Salame  
Capital City Cab Service, Inc.  
362 South Front Street  
Steelton, PA 17113

  
Charles E. Thomas, III (PA ID # 201014)