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June 23, 2016

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

RE: *Application of Reading City Cab, LLC*
Commission Docket No. A-2016-2524649

Secretary Chiavetta,

Enclosed is Applicant Reading City Cab's Motion to Compel Discovery Responses of Protestant Discount Cab Service relative to the above referenced application proceeding and docket number.

Thank you for your time and consideration. Should there be any questions or concerns please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'John W. Sweet'.

John W. Sweet, Esq.
Counsel for Joint Protestants

JWS/jws

Cc: *Honorable David Salapa, ALJ; Randall Hurst, Esq.; Thomas Niesen, Esq.; Stephen Welz, Esq.; Kenneth Olsen, Esq.*

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

| | | |
|---|---|----------------|
| Application of Reading City Cab LLC | : | |
| for approval to provide taxi service to | : | |
| transport persons in call or demand service | : | A-2016-2524649 |
| from points in Berks County to points in | : | |
| Pennsylvania and return | : | |

**MOTION OF APPLICANT READING CITY CAB TO COMPEL DISCOVERY
RESPONSES OF PROTESTANT DISCOUNT CAB SERVICE, LLC**

***NOTICE:** A MOTION TO COMPEL DISCOVERY
RESPONSES HAS BEEN FILED IN THE ABOVE
CAPTIONED DOCKET. If you wish to file an Answer with the
Pennsylvania Public Utilities Commission you must do so
within twenty (20) days after this Motion is served. You are
warned that if you fail to do so the Motion may be granted
and your application may be dismissed without further notice.*

NOW COMES, Applicant Reading City Cab, LLC (“Applicant”), and pursuant to the Pennsylvania Rules of Civil Procedure and the Rules and Regulations of the Pennsylvania Public Utility Commission, files this Motion to Compel Discovery Responses of Protestant Discount Cab Service, LLC (“Protestant”). In support thereof, Protestant submits the following:

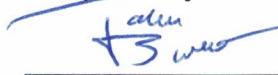
1. On or about January 14, 2016, Applicant filed an Application for Motor Common Carrier of Persons in Call or Demand Service.
2. On or about February 18, 2016, Protestant filed its Protest to the aforementioned Application.

3. On or about April 26, 2016, Applicant served their first set of Interrogatories and Requests for Production of Documents upon Protestant.
4. On or about May 3, 2016, upon discovery of certain typographical errors in its discovery requests, Applicant served "Corrected Discovery Requests" upon Protestant. The Corrected Discovery Requests each contained a Notice that responses were due within twenty (20) days of service, and the Certificate of Service was filed at the above captioned docket, in accordance with Commission regulations.
5. Subsequently, counsel for Applicant and counsel for Protestant agreed to extend the deadline for Protestant's responses to Applicant's Corrected Discovery Requests until June 14, 2016.
6. As of the date of this Motion, no response to Applicant's Corrected Discovery Requests has been received.

WHEREFORE, Applicant respectfully request that this Honorable Commission order Protestant Discount Cab Service, LLC to respond to Applicant Reading City Cab, LLC's Corrected Discovery Requests.

Dated: 6/23/16

Respectfully submitted,

Handwritten signature of John W. Sweet in blue ink, featuring a stylized 'J' and 'S'.

John W. Sweet, Esq.
Supreme Court ID 320182
620 South 13th Street
Harrisburg, PA 17104
Counsel for Applicant

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing ***Motion to Compel Discovery Responses*** by placing a true and correct copy thereof in the United States Mail, first class postage prepaid, addressed as follows:

| | |
|--|--|
| <p>KENNETH A OLSEN ESQUIRE KENNETH A OLSEN ATTORNEY AT LAW 33 PHILHOWER ROAD LEBANON NJ 08833 908.832.9207 <i>Does not accept E-service Representing J&J Leasing & Rentals, Inc.</i></p> | <p>HONORABLE DAVID A. SALAPA, ALJ PENNSYLVANIA PUBLIC UTILITY COMMISSION Pennsylvania Public Utility Commission P.O. Box 3265 Harrisburg, PA 17105-3265</p> |
| <p>THOMAS T NIESEN ESQUIRE THOMAS NIESEN & THOMAS LLC 212 LOCUST STREET SUITE 600 HARRISBURG PA 17108-9500 717.255.7600 <i>Accepts E-service Representing Autocab, Inc.</i></p> | <p>RANDALL G HURST ATTORNEY METTE EVANS & WOODSIDE 3401 N FRONT STREET PO BOX 5950 HARRISBURG PA 17110-0950 717.232.5000 <i>Accepts E-service Representing Discount Cab Service LLC t/a Berks Taxi Cab Service</i></p> |
| <p>STEPHEN G WELZ ESQUIRE LAW OFFICE OF STEPHEN G WELZ PC 999 BERKSHIRE BLVD STE 290 WYOMISSING PA 19610-1254 610.378.5272 <i>Accepts E-service Representing Reading Checker Cab; Reading Metro Taxi; and Reading Yellow Cab</i></p> | |

Dated: 6/23/16

Respectfully submitted,



John W. Sweet, Esq.
Supreme Court ID 320182
620 South 13th Street
Harrisburg, PA 17104
Counsel for Applicant

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ORDER

AND NOW, this _____ day of _____ 20____, Applicant Reading City Cab, LLC's Motion to Compel Discovery Responses is GRANTED. It is hereby ORDERED that Protestant Discount Cab Service, LLC provide full and complete answers to Joint Protestants' discovery requests.

BY THE COURT:
