

**CALDWELL & KEARNS**

A PROFESSIONAL CORPORATION  
ATTORNEYS AT LAW

3631 NORTH FRONT STREET  
HARRISBURG, PENNSYLVANIA 17110-1533

TRANSPORTATION SAFETY

2000 JUN 23 PM 2:01  
COUNSEL  
THOMAS D. CALDWELL, JR.

RICHARD L. KEARNS  
CARL G. WASS  
JAMES R. CLIPPINGER  
CHARLES J. DEHART, III  
JAMES D. CAMPBELL, JR.  
JAMES L. GOLDSMITH  
STANLEY J. A. LASKOWSKI  
JEFFREY T. MCGUIRE\*  
DOUGLAS K. MARSICO  
BRETT M. WOODBURN  
\*ALSO A MEMBER OF NJ BAR

June 27, 2000

717-232-7661  
FAX: 717-232-2766  
thefirm@caldwellkearns.com

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

Re: Application of Vincent Cruz  
A-00116951

Dear Secretary McNulty:

Please find enclosed herewith the original and three (3) copies of a Protest filed by James Danielewicz in the above-captioned matter. A copy has been served upon Applicant as indicated below.

Very truly yours,



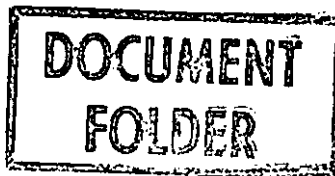
James D. Campbell, Jr.  
CALDWELL & KEARNS

JDCJr:nb  
/Enclosures  
cc: Vincent Cruz  
James Danielewicz  
90-804/406-1

517655

RECEIVED  
SECRETARY'S BUREAU

00 JUN 28 AM 8:05



BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

TRAFFIC SAFETY  
2000 JUN 28 PM 2:04

In Re: Application of  
VINCENT CRUZ

A-00116951

**DOCKETED**  
JUN 28 2000  
PROTEST  
*TR*

RECEIVED  
SECRETARY'S BUREAU  
00 JUN 28 AM 8:05

AND NOW comes James Danielewicz/ t/d/b/a Limousines for Less, 315 Clermont Avenue, Stroudsburg, PA 18360, and protests the above Application.

1. The service and facilities of the Protestant and other authorized carriers are ample to meet all the requirements of the traveling public in the territory involved in this Application.

2. The approval of the Application would be prejudicial to your Protestant and other authorized carriers in this territory in that it will authorize additional competition with the potential resulting loss in revenue and less satisfactory service of the public.

3. This Protest is also directed against the fitness of the Applicant.

4. Approval of the Application would be contrary to the public interest.

5. Your Protestant holds operating authority docketed to A-00108292, a copy of which is attached hereto as Exhibit A and made a part hereof.

6. Protestant knows of no amendment which would satisfy its interest in this matter, but is willing to discuss the same with Applicant or Applicant's counsel.

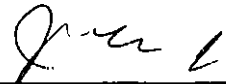
7. Pursuant to Section 333(c) of the Public Utility Law, Protestant requests Applicant or its attorney to furnish the undersigned with a list of the names and addresses of all witnesses whom it intends to call, and the names and addresses of the supporting

**DOCUMENT  
FOLDER**

organizations they will represent, at least ten (10) days prior to the commencement of evidentiary hearings in this case.

WHEREFORE, James Danielewicz, t/d/b/a Limousines for Less, respectfully prays that the above Application be dismissed.

JAMES DANIELEWICZ  
T/D/B/A LIMOUSINES FOR LESS

By:  \_\_\_\_\_  
James D. Campbell, Jr.  
CALDWELL & KEARNS  
3631 North Front Street  
Harrisburg, PA 17110

Dated: June 27, 2000  
90-804/12045-1

SCOPE OF OPERATING AUTHORITY

A-00108292  
Folder 1

To transport, as a common carrier, persons in limousine service, from points in the Borough of Stroudsburg, Monroe County, and from points within an airline distance of 10 statute miles of the limits of the said Borough of Stroudsburg, to the Allentown/Bethlehem/Easton Airport, and vice versa;

A-00108292  
Folder 1, Amendment A

To transport, as a common carrier, persons in limousine service between points in the Counties of Monroe and Pike and from points in the said Counties to points within an airline distance of ten (10) statute miles of the limits thereof, and vice versa;

subject to the following conditions:

- (a) That no right, power or privilege is granted to originate service in the Counties of Lehigh and Northampton.
- (b) That no right, power or privilege is granted to originate service from points in the County of Monroe which are located more than ten (10) statute miles from the limits of the Borough of Stroudsburg, Monroe County.

A-00108292  
Folder 1, Amendment B

To transport, as a common carrier by motor vehicle, passengers, in limousine service, between point in Wayne County and points within an airline distance of twenty-five (25) statute miles of the limits of said County, and from point in said territory to points in Pennsylvania and return;

Subject to the following condition:

That no right, power or privilege is granted to originate service from points in the County of Monroe which are located more than ten (10) statute miles from the limits of the Borough of Stroudsburg, Monroe County.

EXHIBIT "A"

# MERWINE HANYON & KASPSZYK

ATTORNEYS AT LAW

A LIMITED LIABILITY PARTNERSHIP

118 POCONO BOULEVARD

MOUNT POCONO, PENNSYLVANIA 18344

CONNIE J. MERWINE

CPA • LL.M. Taxation

JOSEPH P. HANYON

LL.M. Trial Advocacy

MICHAEL B. KASPSZYK

NEPTLA Board Member



570.839.8050

FAX 570.839.6723

June 27, 2000

**BRODHEADSVILLE OFFICE:**

RT. 209 • MERWINE COMMONS

BRODHEADSVILLE, PA 18322

570.992.2109

FAX 570.992.5090

## CERTIFIED MAIL, RRR

Vincent Cruz  
P.O. Box 42  
Analomink, Pa. 18320

Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-2265

Re: Protest of Pocono Limousine Services, Inc.

Ladies and Gentlemen:

Please be advised that my office represents Pocono Limousine Services, Inc. Enclosed for filing please find a Protest of Pocono Limousine Service, Inc.

Thank you for your attention.

Very truly yours,

MERWINE, HANYON & KASPSZYK

By: \_\_\_\_\_

Joseph P. Hanyon, Esq.

JPH/fd

Encls.

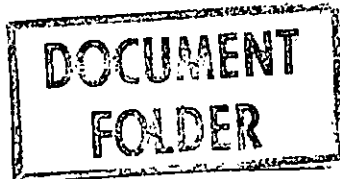
cc: Pocono Limousine Services, Inc.

518502

A-00116951

RECEIVED  
SECRETARY'S BUREAU  
003 JUL -3 AM 10:35

RECEIVED  
SECRETARY'S BUREAU  
2000 JUL -3 PM 2:19



51

RECEIVED  
TRANSPORTATION SAFETY  
2000 JUL -3 PM 2:20

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

518503

**DOCKETED**  
JUL 03 2000  
*R*

IN RE:

VINCENT CRUZ

PROTEST ON BEHALF OF POCONO LIMOUSINE SERVICE, INC.

MERWINE, HANYON & KASPSZYK  
Joseph P. Hanyon, Esq.  
Attorney I.D. No. 6337  
118 Pocono Boulevard  
Mt. Pocono, PA 18344  
(570) 839-8050

RECEIVED  
SECRETARY'S OFFICE  
09 JUL -3 AM 10:35

DOCUMENT  
FOLDER

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN RE:

APPLICATION OF  
VINCENT CRUZ

PROTEST OF POCONO LIMOUSINE SERVICE, INC.

AND NOW, comes Pocono Limousine Service, Inc. by and through its attorney, Joseph P. Hanyon, Esq., and protests the above referenced application representing as follows:

1. The name, business address and telephone number of protestant is: Pocono Limousine Service, Inc., P.O. Box 340, Mount Pocono, Pennsylvania 18344, (717) 839-2111.
2. The name, business address and telephone number of the protestant's attorney is: Joseph P. Hanyon, Esq., 118 Pocono Boulevard, Mount Pocono, Pennsylvania 18344, (570) 839-8050.
3. The authority sought by applicant is attached as Appendix "A".
4. The protestant possesses authority under Commission Docket No. A-00103841. A copy of said pertinent authority is attached hereto as Appendix "B".
5. The application will become competitive with and detrimental to existing service of Pocono Limousine Service, Inc. Protestant owns or has access to a full range of equipment for limousine service, inter alia, within the certified areas sought by applicant, has satisfactory maintenance facilities, skilled and experienced drivers and other employees.
6. Attached hereto as Appendix "C" is a suggested restrictive amendment which, if accepted by the Commission, will result in the withdrawal of the protest of the above named carrier.

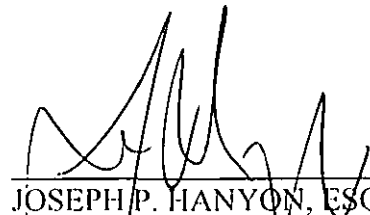
5185018  
00 JUL -9 AM 10:35  
RECEIVED  
SECRETARY'S BUREAU

7. Protestant performs services within the scope of its present authority. The diversion of revenues presently being enjoyed by Protestant, would be detrimental to and destructive of the public interest. Approval of this application is not necessary or proper for the service, accommodation, convenience or safety of the public in view of the existing and adequate services of Protestant and other carriers.

8. This protest also goes to applicant's fitness.

WHEREFORE, *Pocono Limousine Service, Inc.* prays that this application be dismissed.

By:



JOSEPH P. HANYON, ESQUIRE  
Attorney for Protestant  
Attorney ID # 60337  
118 Pocono Boulevard  
Mt. Pocono, PA 18344  
(570) 839-8050

CERTIFICATE OF SERVICE

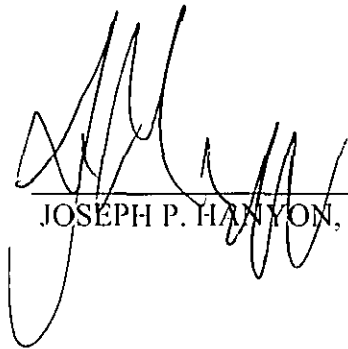
518505

I hereby certify that I have this day served a copy of the foregoing document upon the applicant, Vincent Cruz, at the addresses listed below, by United States certified mail, first class, postage prepaid.

Vincent Cruz  
P.O. Box 42  
Analomink, Pa. 18320

00 JUL -3 AM 10:35  
RECEIVED  
SECRETARY'S BUREAU

Dated: June 27, 2000



\_\_\_\_\_  
JOSEPH P. HANYON, ESQ.

APPENDIX "A"

PENNSYLVANIA BULLETIN, VOL. 30, No. 26, June 24, 2000, Page 3243

"A-00116951, Vincent Cruz ( P.O. Box 42, Analomink, Monroe county, PA 18320) - persons in limousine service, between points in the counties of Monroe and Pike, and from points in said counties, to points in Pennsylvania, and vice versa.

## APPENDIX "B"

To transport, as a common carrier, by motor vehicle, persons, in luxury limousine service, in vehicles with a seating capacity of ten (10) passengers or less, excluding the driver, between points in the country of Monroe, and within an airline distance of five (5) statute miles of the limits thereof, and from points in said territory, to points in Pennsylvania, and vice versa.

To transport, as a common carrier, by motor vehicle, persons, in airport transfer service, from points in the County of Monroe, and within an airline distance of ten (10) statute miles of the limits thereof, to airport facilities within the said territory, and from points in said territory, to the Wilkes-Barre/Scranton Airport, located in the Township of Pittston, Luzerne County, the Allentown-Bethlehem-Easton Airport, located in the Township of Hanover, Lehigh County, and the Philadelphia International Airport located in the City and County of Philadelphia and the Township of Tinicum, Delaware County, and vice versa.

APPENDIX "C"

PROPOSED RESTRICTIVE AMENDMENT

At present there is not a restrictive amendment that Protestant knows of that will satisfy Protestant's protest.

Law Offices

**SCHUBERT, BELLWOAR, CAHILL & QUINN**

A PROFESSIONAL CORPORATION  
TWO PENN CENTER, SUITE 1400  
1500 JOHN F. KENNEDY BOULEVARD  
PHILADELPHIA, PA 19102-1890  
(215) 569-3535  
FAX: (215) 557-7426  
E-MAIL ADDRESS: attorneys@sbcq.com

NEW JERSEY OFFICE  
311 W. CUTHBERT BOULEVARD  
HADDON TOWNSHIP, NJ 08108  
(856) 854-5757  
FAX: (856) 858-8616

E-MAIL ADDRESS: rmulcahey@sbcq.com

DIRECT DIAL NO: (215) 587-0107

RECEIVED  
TRANSPORTATION & SAFETY  
2000 JUL 14 11 04 20

HARRY J.J. BELLWOAR III ♦  
JOHN P. QUINN  
JOHN J. CAHILL, JR.  
ROBERT G. BELLWOAR  
JOHN P. GALLAGHER  
DEBORAH E. KOLODNER ♦  
RICHARD T. MULCAHEY, JR.  
JAMES M. TYLER ♦  
JOSEPH W. CUNNINGHAM ♦  
MICHAEL S. PIOTROWICZ  
PATRICIA FARRELL KERELO  
CHRISTOPHER B. HOGAN ♦  
KATHLEEN M. O'CONNELL ♦  
MARK D. PFEIFFER ♦  
ERIC A. FELDHAKE ♦  
ROBERT A. JONES II ♦  
COUNSEL:  
ROBERT T. LYNCH  
JOHN D. LUCEY, JR.  
ROBERT F. BLANCK  
OF COUNSEL:  
KENNETH W. LANDIS  
WILLIAM E. SCHUBERT, JR.  
1949-1998  
THOMAS M. SCHUBERT  
1951-1989  
♦ also Member of the New Jersey Bar  
† New Jersey Managing Attorney

519655  
00 JUL 13 AM 9:10

July 11, 2000

ORIGINAL

RECEIVED  
SECRETARY'S BUREAU

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

Re: Application of Vincent Cruz  
PUC Docket No. A-00116951

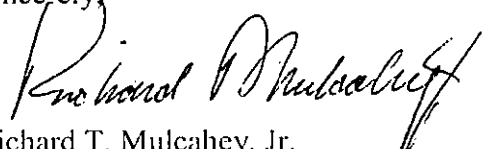
Dear Mr. McNulty:

Please be advised that this office represents Corporate Livery, Inc., Elite Industries, Inc., t/d/b/a Elite Limo, and J & J Leasing & Rentals, Inc., t/d/b/a J & J Limousine Service, t/d/b/a J & J Luxury Bus and Van Service, Protestants to the above-captioned Application.

On behalf of our clients, we are enclosing herein Protests to the above-referenced Application. Copies of the same have been forwarded this date to Applicant.

Kindly acknowledge receipt of the enclosures by time-stamping a copy of this letter and returning it to the undersigned in the enclosed, self-addressed, stamped envelope provided.

Sincerely



Richard T. Mulcahey, Jr.

RTMJR/tob  
Enclosures

- cc: Mr. Vincent Cruz (w/enclosure)
- Corporate Livery, Inc.(w/enclosure)
- Elite Industries, Inc. (w/enclosure)
- J & J Leasing Rentals, Inc. (w/enclosure)

DOCUMENT  
FOLDER

23

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

RECEIVED  
2000 JUL 14 11:00

IN RE: APPLICATION OF  
VINCENT CRUZ

519656

00 JUL 13 AM 9:10

DOCKET NO.: A-00116951

RECEIVED  
SECRETARY'S BUREAU

**PROTEST**

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

AND NOW, comes Corporate Livery, Inc., by its attorneys, Richard T. Mulcahey, Jr. and Mark Pfeiffer of Schubert, Bellwoar, Cahill & Quinn, and files this Protest to the instant Application and respectfully represents that:

1. The name, address and telephone number of the Protestant are:

Corporate Livery, Inc.  
P.O. Box 545  
Allentown, PA 18105  
(610) 435-1441

**DOCKETED**  
JUL 13 2000  
TZ

2. The name, address and telephone number of the Protestant's attorneys are:

Richard T. Mulcahey, Jr., Esquire  
Mark Pfeiffer, Esquire  
Schubert, Bellwoar, Cahill & Quinn  
1500 John F. Kennedy Boulevard  
Two Penn Center Plaza, Suite 1400  
Philadelphia, PA 19102  
(215) 587-0107

3. Protestant is certificated by Your Honorable Commission at Application Docket No. A-00110212, F.2. A copy of the relevant portions of the Protestant's authorities upon which its Protest is herein predicated is attached hereto as Exhibit "A" and incorporated by reference herein.

4. Applicant has not demonstrated its fitness to be granted a Certificate of Public

**DOCUMENT  
FOLDER**

Convenience by Your Honorable Commission.

5. Approval of the Application would create new and unwarranted competition to the detriment of Protestant and ultimately the public, tending to deprive Protestant of customers and to divert revenues from it which are essential to the maintenance of an adequate transportation system responsive to the needs of the public.

6. Approval of the Application would be contrary to the accommodation, convenience, service and safety of the public.

7. Protestant would consider withdrawing its Protest in the event Applicant agrees not to provide service which is included in Protestant's Certificate of Public Convenience.

Respectfully submitted,

By: 

RICHARD T. MULCAHEY, JR.  
MARK PFEIFFER  
SCHUBERT, BELLWOAR, CAHILL & QUINN  
Attorneys for Protestant

**CORPORATE LIVERY, INC.**  
**PUC DOCKET NO. A-00110212, F.2**

To transport, as a common carrier, persons in limousine service, in Cadillac or Lincoln vehicles, having a seating capacity of seven (7) passengers or less, excluding the driver, between points in the city of Allentown, Lehigh County, and within an airline distance of seventy-five (75) statute miles of the limits of said city;

subject to the following condition:

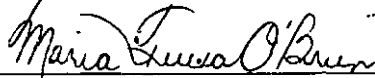
That no right, power or privilege is granted to provide service between points in Monroe County.

**EXHIBIT "A"**

CERTIFICATE OF SERVICE

I, Maria Teresa O'Brien, hereby certify that on July 11, 2000, I forwarded by first-class mail, postage pre-paid, a copy of the Protest filed on behalf of Corporate Livery, Inc. to Applicant, Vincent Cruz, P. O. Box 42, Analomink, Monroe County, PA 18320.

Date: July 11, 2000

  
\_\_\_\_\_  
MARIA TERESA O'BRIEN

Law Offices

# SCHUBERT, BELLWOAR, CAHILL & QUINN

A PROFESSIONAL CORPORATION  
TWO PENN CENTER, SUITE 1400  
1500 JOHN F. KENNEDY BOULEVARD  
PHILADELPHIA, PA 19102-1890  
(215) 569-3535  
FAX: (215) 557-7426  
E-MAIL ADDRESS: attorneys@sbcq.com

NEW JERSEY OFFICE  
311 W. CUTHBERT BOULEVARD  
HADDON TOWNSHIP, NJ 08108  
(856) 854-5757  
FAX: (856) 858-8616

E-MAIL ADDRESS: mpfeiffer@sbcq.com  
DIRECT DIAL NO: (215) 587-0125

July 31, 2000

Mr. Vincent Cruz  
P. O Box 42  
Analomink, PA 18329

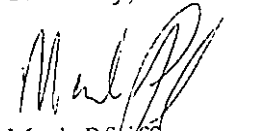
Re: Application of Vincent Cruz  
PUC Docket No.: A-00116951

DOCUMENT  
FOLDER

Dear Mr. Cruz:

Please be advised that this office represents J & J Leasing & Rentals, Inc., t/d/b/a J & J Limousine Service, Corporate Livery, Inc. and Elite Industries Inc. t/d/b/a Elite Limo in the above-captioned matter. Accordingly, I enclose herewith Interrogatories and Request for Production of Documents. Please provide me with verified answers within twenty (20) days of the date of receipt.

Sincerely,

  
Mark Pfeiffer

MP/tob  
Enclosure

cc: James J. McNulty, Secretary ✓  
(Certificate of Service only)  
J & J Leasing & Rentals, Inc. (w/enclosure)  
Corporate Livery, Inc. (w/enclosure)  
Elite Industries, Inc. (w/enclosure)

HARRY J.J. BELLWOAR III ♦  
JOHN P. QUINN  
JOHN J. CAHILL, JR.  
ROBERT G. BELLWOAR  
JOHN P. GALLAGHER  
DEBORAH E. KOLODNER ♦  
RICHARD T. MULCAHEY, JR.  
JAMES M. TYLER ♦  
JOSEPH W. CUNNINGHAM ♦  
MICHAEL S. PIOTROWICZ  
PATRICIA FARRELL KERELO  
CHRISTOPHER B. HOGAN ♦  
KATHLEEN M. O'CONNELL ♦  
MARK D. PFEIFFER ♦  
ERIC A. FELDHAKES ♦  
ROBERT A. JONES II ♦

COUNSEL:  
ROBERT T. LYNCH  
JOHN D. LUCEY, JR.  
ROBERT F. BLANCK

OF COUNSEL:  
KENNETH W. LANDIS

WILLIAM E. SCHUBERT, JR.  
1949-1998

THOMAS M. SCHUBERT  
1951-1989

♦ also Member of the New Jersey Bar  
† New Jersey Managing Attorney

622246

RECEIVED  
SECRETARY'S BUREAU  
00 AUG - 2 AM 7:54

CERTIFICATE OF SERVICE

I, Maria Teresa O'Brien, hereby certify that on July 31, 2000, I forwarded by first-class mail, postage pre-paid, a copy of the Protestants' Interrogatories and Request for Production of Documents to the following parties addressed as follows.

James J. McNulty, Secretary  
PA Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
(Certificate of Service only)

Vincent Cruz  
P. O. Box 42  
Analomink, PA 18320

DOCKETED  
AUG 04 2000

DOCUMENT  
FOLDER

DATE: July 31, 2000

  
\_\_\_\_\_  
Maria Teresa O'Brien

ORIGINAL

Law Offices

SCHUBERT, BELLWOAR, CAHILL & QUINN

A PROFESSIONAL CORPORATION  
TWO PENN CENTER, SUITE 1400  
1500 JOHN F. KENNEDY BOULEVARD  
PHILADELPHIA, PA 19102-1890  
(215) 569-3535  
FAX: (215) 557-7426  
E-MAIL ADDRESS: attorneys@sbcq.com

NEW JERSEY OFFICE  
311 W. CLYBURN BOULEVARD  
TOWNSHIP NJ 08108  
(856) 854-5757  
FAX: (856) 858-8616

E-MAIL ADDRESS: mpfeiffer@sbcq.com  
DIRECT DIAL NO: (215) 587-0125

00 AUG 30 AM 8:46

RECEIVED  
SECRETARY'S BUREAU

August 28, 2000

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

DOCUMENT  
FOLDER

Re: Application of Vincent Cruz  
PUC Docket No. A-00116951

Dear Mr. McNulty:

Please be advised that this office represents Corporate Livery, Inc., Elite Industries, Inc., t/d/b/a Elite Limo, and J & J Leasing & Rentals, Inc., t/d/b/a J & J Limousine Service, t/d/b/a J & J Luxury Bus and Van Service, Protestants to the above-captioned Application. Accordingly, I enclose herewith for filing the original and two (2) copies of Protestant's Motion to Compel Answers to Interrogatories:

Kindly acknowledge receipt of the enclosures by time-stamping a copy of this letter and returning it to the undersigned in the enclosed, self-addressed, stamped envelope provided.

Sincerely,

  
Mark Pfeiffer

MP/kab  
Enclosures  
cc: Mr. Vincent Cruz (w/enclosure)  
Clients

HARRY J.J. BELLWOAR III ♦†  
JOHN P. QUINN  
JOHN J. CAHILL, JR.  
ROBERT G. BELLWOAR  
JOHN P. GALLAGHER  
DEBORAH E. KOLODNER ♦  
RICHARD T. MULCAHEY, JR.  
JAMES M. TYLER ♦  
JOSEPH W. CUNNINGHAM ♦  
MICHAEL S. PIOTROWICZ  
PATRICIA FARRELL KERELO  
CHRISTOPHER B. HOGAN ♦  
KATHLEEN M. O'CONNELL ♦  
MARK D. PFEIFFER ♦  
ERIC A. FELDHAKE ♦  
ROBERT A. JONES II ♦  
COUNSEL:  
ROBERT T. LYNCH  
JOHN D. LUCEY, JR.  
ROBERT F. BLANCK  
OF COUNSEL:  
KENNETH W. LANDIS  
WILLIAM E. SCHUBERT, JR.  
1949-1998  
THOMAS M. SCHUBERT  
1951-1989  
♦ also Member of the New Jersey Bar  
† New Jersey Managing Attorney

ORIGINAL

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

726301

00 AUG 30 AM 8:46

IN RE: APPLICATION OF  
VINCENT CRUZ

: PUC DOCKET NO. A-00116951  
SECRETARY'S BUREAU

**MOTION TO COMPEL ANSWERS TO INTERROGATORIES**

AND NOW, come Protestants, J & J Leasing & Rentals, Inc., t/d/b/a J & J Limousine Service, Corporate Livery, Inc. and Elite Industries, Inc. t/d/b/a Elite Limo, by their attorneys, Mark Pfeiffer and Richard T. Mulcahey, Jr., Schubert, Bellwoar, Cahill & Quinn and file this Motion to Compel Answers to their Interrogatories and Request for Production of Documents propounded to the above-captioned Applicant, and aver as follows:

1. Protestants, on July 31, 2000 propounded Interrogatories and Document Requests upon Applicant, Vincent Cruz. A copy of the cover letter is attached at Exhibit "A".
2. Pursuant to the rules and regulations of the Pennsylvania Public Utility Commission, Applicant was required to answer or object to the discovery requests within 20 days.
3. As of the date of this Motion, Protestants nor their counsel have received any request for additional time in which to respond nor has Applicant filed objections or answers concerning said discovery requests.

DOCUMENT  
FOLDER

DOCKETED  
AUG 31 2000

WHEREFORE, Protestants respectfully request your Honorable Administrative Law Judge to issue an Order compelling the Applicant to answer Protestants' discovery requests within ten days or be subject to the sanction provisions of the Rules and Regulations of the Pennsylvania Public Utility Commission at 52 Pa. Code Sections 5.371-5.372.

Respectfully submitted,

SCHUBERT, BELLWOAR, CAHILL & QUINN

Dated: August 28, 2000

By: 

MARK PFEIFFER  
Two Penn Center Plaza, Suite 1400  
1500 John F. Kennedy Blvd.  
Philadelphia, PA 19102  
(215) 587-0125  
Attorney for Protestants

**PROPOSED ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2000 it is hereby ORDERED AND DECREED that Applicant, Vincent Cruz, shall provide responses to Protestants' Interrogatories and Request for Production of Documents by \_\_\_\_\_ or be subject to sanctions.

---

J.

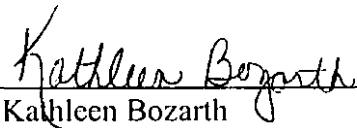
CERTIFICATE OF SERVICE

I, Kathleen Bozarth, hereby certify that on August 28, 2000, I forwarded by first-class mail, postage pre-paid, a copy of the Protestants' Motion to Compel Answers to Interrogatories and Request for Production of Documents to the following parties addressed as follows.

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

Vincent Cruz  
P. O. Box 42  
Analomink, PA 18320

DATE: August 28, 2000

  
Kathleen Bozarth

Law Offices

# SCHUBERT, BELLWOAR, CAHILL & QUINN

A PROFESSIONAL CORPORATION  
TWO PENN CENTER, SUITE 1400  
1500 JOHN F. KENNEDY BOULEVARD  
PHILADELPHIA, PA 19102-1890  
(215) 569-3535  
FAX: (215) 557-7426  
E-MAIL ADDRESS: attorneys@sbcq.com

NEW JERSEY OFFICE  
311 W. CUTHBERT BOULEVARD  
HADDON TOWNSHIP, NJ 08108  
(856) 854-5757  
FAX: (856) 858-8616

E-MAIL ADDRESS: mpfeiffer@sbcq.com

DIRECT DIAL NO: (215) 587-0125

July 31, 2000

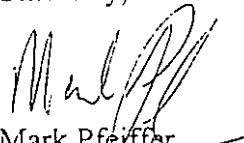
Mr. Vincent Cruz  
P. O Box 42  
Analomink, PA 18329

Re: Application of Vincent Cruz  
PUC Docket No.: A-00116951

Dear Mr. Cruz:

Please be advised that this office represents J & J Leasing & Rentals, Inc., t/d/b/a J & J Limousine Service, Corporate Livery, Inc. and Elite Industries Inc. t/d/b/a Elite Limo in the above-captioned matter. Accordingly, I enclose herewith Interrogatories and Request for Production of Documents. Please provide me with verified answers within twenty (20) days of the date of receipt.

Sincerely,



Mark Pfeiffer

MP/tob  
Enclosure

cc: James J. McNulty, Secretary  
(Certificate of Service only)  
J & J Leasing & Rentals, Inc. (w/enclosure)  
Corporate Livery, Inc. (w/enclosure)  
Elite Industries, Inc. (w/enclosure)

HARRY J.J. BELLWOAR III ♦♦  
JOHN P. QUINN  
JOHN J. CAHILL, JR.  
ROBERT G. BELLWOAR  
JOHN P. GALLAGHER  
DEBORAH E. KOLODNER ♦  
RICHARD T. MULCAHEY, JR.  
JAMES M. TYLER ♦  
JOSEPH W. CUNNINGHAM ♦  
MICHAEL S. PIOTROWICZ  
PATRICIA FARRELL KERELO  
CHRISTOPHER B. HOGAN ♦  
KATHLEEN M. O'CONNELL ♦  
MARK D. PFEIFFER ♦  
ERIC A. FELDHAKEN ♦  
ROBERT A. JONES II ♦

COUNSEL:  
ROBERT T. LYNCH  
JOHN D. LUCEY, JR.  
ROBERT F. BLANCK  
OF COUNSEL:  
KENNETH W. LANDIS

WILLIAM E. SCHUBERT, JR.  
1949-1998

THOMAS M. SCHUBERT  
1951-1989

♦ Also Member of the New Jersey Bar  
† New Jersey Managing Attorney



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Office Of Administrative Law Judge  
P.O. Box 3265, Harrisburg, PA 17105-3265

IN REPLY PLEASE  
REFER TO OUR FILE

September 6, 2000

In Re: A-00116951

(See attached list)

Application of Vincent Cruz

NOTICE

It appears that the above-captioned matter could be processed by mediation between or among the parties. Mediation is an informal, non-adjudicatory process. The mediator does not make a decision. Instead, the mediator serves as an impartial facilitator who helps the parties resolve their disputes. In other words, mediation is a process which allows the parties to control the outcome of their dispute, as opposed to a hearing where the Administrative Law Judge and the Commission control the outcome.

Moreover, mediation is different from a settlement conference which is based on competitive negotiations. In mediation, the parties agree to work together toward a final resolution of their differences considering how any solution must address the interests of all parties.

There is no stenographer at a mediation session and discussions are **confidential**, unless otherwise provided for by law. The mediation is not binding (except for an agreement reached) and any party may withdraw from the mediation at any time. Mediation is an efficient and economical procedure compared to a hearing which is often expensive and time-consuming.

**DOCKETED**  
SEP 8 2000

**DOCUMENT  
FOLDER**

There can be no mediation unless the party with the burden of proof, and all other necessary parties, consent to mediate. If the party with the burden of proof consents, in proceedings subject to a statutory deadline for adjudication, that party must also agree, in writing, to extend the statutory deadline by, at least, 60 days.

The Commission's file will reflect that you consent to the mediation process, unless the mediator named below hears from you to the contrary, in writing, within 15 days of the date of this letter. The mediator's name and address are as follows:

Mediator:           **Herbert R. Nurick**  
                          Pennsylvania Public Utility Commission  
                          P.O. Box 3265  
                          Harrisburg, PA 17105-3265  
                          Telephone: (717) 783-5428  
                          Fax: (717) 787-0481

By consenting to mediate, the Commission understands that you have made a commitment to act in good faith toward resolving the dispute in this matter. If you cannot make this commitment, you should not consent to use the mediation process.

If the parties agree to mediation, you will receive notification by mail of the date, time and place set for the mediation conference. If you have any questions regarding mediation, please call the mediator at the number provided above.

If you are a person with a disability, and you wish to attend the mediation session, we may be able to make arrangements for your special needs. Please call Norma Lewis at the Public Utility Commission:

- Scheduling Office: 717-787-1399
- AT&T Relay Service number for persons who are deaf or hearing impaired: 1-800-654-5988.

pc: Mediator Nurick  
Ann M. Humes, Mediation Assistant  
Beth Plantz  
Docket Section  
Calendar File



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Office Of Administrative Law Judge  
P.O. Box 3265, Harrisburg, PA 17105-3265

IN REPLY PLEASE  
REFER TO OUR FILE

October 13, 2000

In Re: A-00116951

(See letter dated 9/6/00)

DOCUMENT  
FOLDER Application of Vincent Cruz

DOCKETED  
OCT 25 2000

NOTICE

The Commission's file reflects that the parties consent to use the mediation process in this proceeding. Please give me your available dates for the month of **November, 2000**, within 10 days of the date of this notice. If the selected month is not suitable for your schedule, please submit your available dates for the early part of the following month. Please reply to:

Mediation Assistant:

**Ann M. Humes**

Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
Telephone: (717) 783-9959  
Fax: (717) 787-0481

You will be subsequently informed by notice of the date selected by all parties for the mediation.

If you are a person with a disability, and you wish to attend the mediation session, we may be able to make arrangements for your special needs. Please call Norma Lewis at the Public Utility Commission:

- Scheduling Office: 717-787-1399
- AT&T Relay Service number for persons who are deaf or hearing impaired: 1-800-654-5988.

pc: Mediator Nurick  
Ann M. Humes, Mediation Assistant  
Beth Plantz  
Docket Section  
Calendar File



**COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Office Of Administrative Law Judge  
P.O. Box 3265, Harrisburg, PA 17105-3265

IN REPLY PLEASE  
REFER TO OUR FILE

November 2, 2000

In Re: **A-00116951**

(See attached list)

**Application of Vincent Cruz**

For the right to begin to transport, as a common carrier, by motor vehicle, persons in limousine service, between points in the counties of Monroe and Pike, and from points in said counties, to points in Pennsylvania, and vice versa.

**Hearing Notice**

This is to inform you that a hearing on the above-captioned case will be held as follows:

Type: **Initial**

Date: **Tuesday, January 30, 2001**

Time: **10:00 a.m.**

Location: **In an available hearing room  
Philadelphia State Office Building  
Broad and Spring Garden Streets  
Philadelphia, Pennsylvania**

Presiding: **Administrative Law Judge Ky Van Nguyen  
1302 Philadelphia State Office Building  
1400 West Spring Garden Street  
Philadelphia, PA 19130  
Telephone: (215) 560-2105  
Fax: (215) 560-3133**

**DOCUMENT  
FOLDER**

**DOCKETED**  
NOV 6 2000

Attention: You may lose the case if you do not come to this hearing and present facts on the issues raised.

If you intend to file exhibits, 2 copies of all hearing exhibits to be presented into evidence must be submitted to the reporter. An additional copy must be furnished to the Presiding Officer. A copy must also be provided to each party of record.

Except for those individuals representing themselves, the Commission's rules require that all parties have an attorney; therefore, you should have an attorney of your choice file an entry of appearance before the scheduled hearing.

If you are a person with a disability, and you wish to attend the hearing, we may be able to make arrangements for your special needs. Please call Norma Lewis at the Public Utility Commission:

- Scheduling Office: 717-787-1399
- AT&T Relay Service number for persons who are deaf or hearing-impaired: 1-800-654-5988.

pc: Judge Nguyen  
Steve Springer, Scheduling Officer  
Beth Plantz  
Docket Section  
Calendar File