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John A. Pillar  
Karen S. Timko

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LAW OFFICES OF  
JOHN A. PILLAR

680 WASHINGTON ROAD  
SUITE B101  
PITTSBURGH, PENNSYLVANIA 15228-1925

(412) 343-0970  
FAX (412) 343-0971  
japillar@earthlink.net

April 13, 2005

Re: Pennsylvania Public Utility Commission,  
Bureau of Transportation and Safety v.  
Linda G. Krein, t/a We Care Limousine Service  
Docket A-00117689C0501  
File No. 2992

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

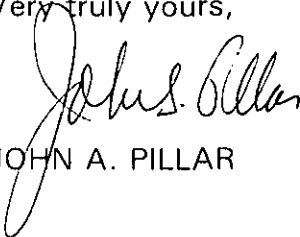
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Dear Mr. McNulty:

Enclosed for filing are the original and three copies of an **Answer to Complaint** in connection with the above docketed proceeding.

Please acknowledge receipt of the enclosures on the duplicate of this letter of transmittal and return it in the stamped, self-addressed envelope provided.

Very truly yours,



JOHN A. PILLAR

sw

Enclosures

cc: Wendy J. Keezel, Chief of Enforcement (w/encl.)  
Linda G. Krein (w/o encl.)

RJP

Before the  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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2005 APR 18 PM 2:00

SECRETARY'S OFFICE

PENNSYLVANIA PUBLIC UTILITY )  
COMMISSION, BUREAU OF )  
TRANSPORTATION AND SAFETY )

Docket No. A-00117689C0501

v. )

LINDA G. KREIN, t/a )  
WE CARE LIMOUSINE SERVICE )

DOCKETED

APR 18 2005

**ANSWER TO COMPLAINT**

AND NOW COMES, Linda G. Krein, t/a We Care Limousine Service, by and through her attorney, John A. Pillar, and answers the Complaint filed at the above docket number as follows:

1. The averments of paragraph 1 of the Complaint are admitted.
2. The averments of paragraph 2 of the Complaint are admitted.

3-26. As to the averments contained in paragraphs 3-26 of the Complaint, Respondent admits the allegations contained in paragraphs 3-26 of the Complaint insofar as it is alleged that Respondent's tariff in Limousine Pa. P.U.C. No. 4 indicates a charge of \$45 for the first hour and \$11.25 for each additional ¼ hour for the use of a luxury sedan. Respondent further admits that the aforementioned tariff also indicates that an 18% gratuity be assessed in addition to all other rates and charges. Respondent is without knowledge as to the truth or accuracy of the remaining averments contained in paragraphs 3 through 26 of the Complaint and the same are hereby denied, strict proof thereof being demanded by the Respondent.

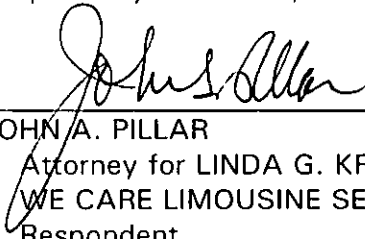
27. The averments of paragraph 27 of the Complaint constitute a legal conclusion to which no factual response is required.

DOCUMENT  
FOLDER

28. The averments of paragraph 28 of the Complaint constitute a legal conclusion to which no factual response is required.

WHEREFORE, Respondent respectfully requests that the Complaint be dismissed.

Respectfully submitted,

  
\_\_\_\_\_  
JOHN A. PILLAR  
Attorney for LINDA G. KREIN, t/a  
WE CARE LIMOUSINE SERVICE,  
Respondent

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SECRETARY'S BUREAU

VERIFICATION

I verify that the statements made in the foregoing **Answer to Complaint** are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date:

4-12-05

*Linda Krein*

LINDA G. KREIN