

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of : Commission Docket No.:  
La Mexicana Express Service LLC : A-2017-2590784

**JOINT PROTEST OF EXPRESS TAXI, LLC,  
READING CITY CAB, LLC, AND AMIGO CAB, LLC**

Joint Protestants Express Taxi, LLC, Reading City Cab, LLC, and Amigo Cab, LLC (“Joint Protestants” or “Protestants”), pursuant to 52 Pa. Code § 3.381, file this Joint Protest of the Application of La Mexicana Express Service LLC (“Applicant”) for authority to provide common carrier transportation service. In support thereof, Protestant submits the following:

1. The name and address of Protestants are:

Express Taxi, LLC  
2304 Walnut Street  
Harrisburg, PA 17103

Reading City Cab, LLC  
2304 Walnut Street  
Harrisburg, PA 17103

Amigo Cab, LLC  
2304 Walnut Street  
Harrisburg, PA 17103

2. The name and address of Protestant’s attorney is:

Sean M. Cooper  
Cooper Law PLLC  
PO Box 312  
Elizabethtown PA 17022

3. Applicant has filed an Application with the Public Utility Commission (the “Commission”) for the right to begin to transport, as a common carrier, by motor vehicle, persons in call or demand service, between points in Berks County.

4. Protestant Express Taxi, LLC, holds authority of the Commission in conflict with the authority sought by Applicant. Protestant's authority is at Docket No. A-2015-2475967.
5. Protestant Reading City Cab, LLC, has an application for authority pending before the Commission in potential conflict with the authority sought by Applicant. Protestant's pending application is at Docket No. A-2016-2524649.
6. Protestant Amigo Cab, LLC, has an application for authority pending before the Commission in potential conflict with the authority sought by Applicant. Protestant's pending application is at Docket No. A-2015-2475776.
7. Joint Protestants submit that there is no need for the proposed service, thus the approval of this application will not serve a useful public purpose or need, but will instead duplicate already existing service to the detriment of existing carriers, including Joint Protestants.
8. Applicant failed to attach any financial information to its application that would indicate Applicant's financial fitness, thus Protestants believe and therefore aver that Applicant does not possess the requisite financial fitness to provide the proposed service.
9. Applicant failed to attach information to its application that would indicate how Applicant intends to operate, thus Protestants believe and therefore aver that Applicant does not possess the requisite technical fitness to provide the proposed service.
10. Applicant has submitted no evidence indicating that Applicant can meet the criteria in 52 Pa. Code § 41.14, thus approval of the Application is not necessary or proper for the service, accommodation, convenience, or safety of the public and would be contrary to public interest.

11. Protestants submit that entry of a new carrier would endanger or impair the operations of existing carriers, including those of Joint Protestants, to an extent that, on balance, the granting of authority would be contrary to public interest.

12. Protestants are unaware of any restrictive amendment that would adequately protect Protestants' interests to the point where they will withdraw their Protests. However, Protestants are open and willing to negotiate such an agreement.

13. Regarding any hearing on this matter, pursuant to Pennsylvania Public Utility Code 66 Pa. C.S. § 333(c), demand is made upon Applicant to furnish to Protestants' counsel a list of the names and addresses of any witnesses, along with names and addresses of any entity that the witnesses may represent and the subject matter of the witness's testimony. This is a continuing request and is applicable to all witnesses to be called.

WHEREFORE, Joint Protestants Express Taxi, LLC, Reading City Cab, LLC, and Amigo Cab, LLC, respectfully request that this honorable Commission deny the Application of La Mexicana Express Service LLC.

Date: 3/30/17

Respectfully submitted,



Sean M. Cooper, ID# 320940

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PO Box 312

Elizabethtown PA 17022

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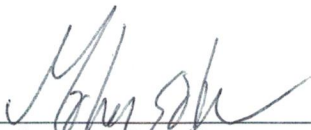
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**VERIFICATION**

I, Maher S. Ahmed, General Manager for Joint Protestants, hereby verify that the statements made in the foregoing Joint Protest are true and correct to the best of my knowledge, information and belief. I understand that the statements in the foregoing document are made subject to the penalties of 18 Pa.C.S. §4909 relating to unsworn falsification to authorities.

Date 3/30/17

  
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Maher S. Ahmed  
On behalf of Joint Protestants

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**CERTIFICATE OF SERVICE**

Pursuant to the Commission's Rules of Procedure, I hereby certify that on this date I served the following parties with the foregoing *Joint Protest* via the means listed below:

**Via E-mail:**

Kenneth A. Olsen, Esq.  
33 Philhower Road  
Lebanon, NJ 08833  
kolsen53@earthlink.net

Date: 3/30/17

Respectfully submitted,



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*Counsel for Joint Protestants*