

**BEFORE THE PENNSYLVANIA
PUBLIC UTILITY COMMISSION**

GALLAGHER LAW P.C.

By: DAVID P. TEMPLE, ESQUIRE

Atty I.D. # 86937

1600 Market Street, Suite 1320

Philadelphia, PA 19103

215-963-1555

ATTORNEY FOR RESPONDENT

PASHA LUXURY SERVICES, INC

t/a CORPORATE SEDAN SERVICE

PENNSYLVANIA PUBLIC UTILITY COMMISSION :
BUREAU OF INVESTIGATION AND ENFORCEMENT : DOCKET NO.
: C-2017-2638061 VS.
:
PASHA LUXURY SERVICES t/a :
CORPORATE SEDAN SERVICES :

**PASHA LUXURY SERVICES, INC ANSWER TO
PENNSYLVANIA PUBLIC UTILITY COMMISSION BUREAU OF INVESTIGATION
AND ENFORCEMENT COMPLAINT**

Respondent PASHA LUXURY SERVICES INC (hereinafter PASHA), by and through its attorney, DAVID P. TEMPLE, ESQUIRE, answers PENNSYLVANIA PUBLIC UTILITY COMMISSION BUREAU OF INVESTIGATION AND ENFORCEMENT (hereinafter PUC) Complaint and avers the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Denied. This averment is a conclusion of law to which no response is required

8. Denied. This averment is a conclusion of law to which no response is required
9. Denied. This averment is a conclusion of law to which no response is required
10. Denied. This averment is a conclusion of law to which no response is required
11. Denied. This averment is a conclusion of law to which no response is required
12. Admitted.
13. Admitted.
14. Denied. These facts were addressed in a previous settlement with the Commission and he can neither deny or confirm the receipt of these items so they are therefore denied and strict proof demanded at trial
15. Denied. These facts were addressed in a previous settlement with the Commission and he can neither deny or confirm the receipt of these items so they are therefore denied and strict proof demanded at trial
16. Denied. These facts were addressed in a previous settlement with the Commission and he can neither deny or confirm the accuracy of this statement without further investigation so they are therefore denied and strict proof demanded at trial
17. Denied. Upon reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth or falsity of this averment, and therefore, strict proof thereof is demanded at trial.
18. Denied. Upon reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth or falsity of this averment, and therefore, strict proof thereof is demanded at trial.

19. Denied. Upon reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth or falsity of this averment, and therefore, strict proof thereof is demanded at trial.
20. Admitted
21. Admitted
22. Denied. Upon reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth or falsity of this averment, and therefore, strict proof thereof is demanded at trial.
23. Denied. This averment is a conclusion of law to which no responses is required.

WHEREFORE, Respondent PASHA LUXURY SERVICES INC respectfully requests this Honorable Commission to dismiss the Complaint in this matter with prejudice.

GALLAGHER LAW, P.C.

By:


DAVID P. TEMPLE, ESQUIRE

Date: 1/8/18

VERIFICATION

I, Gregg Fox, subject to the penalties of 18 Pa C.S.A. §4904, relating to unsworn falsification to authorities, state the attached documents are submitted in response to the foregoing Requests for Production of Documents and that to the best of my knowledge, information and belief they are true and complete.



GREGG FOX, PRESIDENT
PASHA LUXURY SERVICES INC

DATED: 1-8-18