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64 N FOURTH STREET

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RUSSELL E. FARBIARZ \*\*  
ALEXA S. ANTANAVAGE \*\*

OF COUNSEL

A. JOSEPH ANTANAVAGE\*

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July 11, 2018

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

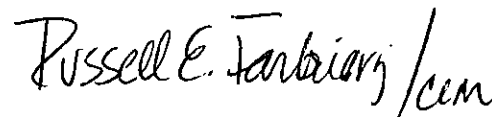
RE: Your File No.: C-2018-2623952  
PA PUC v. Uptown Limousine and Car Service, LLC

Dear Secretary:

Enclosed please find Respondent's Answer with New Matter to the Complaint. Please time-stamp the extra copy enclosed and return it to our office in the enclosed, self-addressed stamped envelope.

Please contact my office should you require anything further.

Very truly yours,



Russell E. Farbiarz, Esquire

REF:clm  
Enclosures  
cc: Michael L. Swinder, Deputy Chief Prosecutor (w/enc.)

RECEIVED  
2018 JUL 12 AM 10:33  
PA PUC  
SECRETARY'S BUREAU

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PA PUC  
SECRETARY'S BUREAU

ANTANAVAGE FARBIARZ, PLLC  
By: Russell E. Farbiarz, Esquire  
Attorney Identification No. 209482  
64 North Fourth St.  
Hamburg, PA 19526  
(610) 562-2000

Attorneys for Defendant

|                           |   |                                |
|---------------------------|---|--------------------------------|
| PENNSYLVANIA PUBLIC       | : | BEFORE THE PENNSYLVANIA PUBLIC |
| UTILITY COMMISSION BUREAU | : | UTILITY COMMISSION             |
| OF INVESTIGATION AND      | : |                                |
| ENFORCEMENT               | : |                                |
|                           | : |                                |
| Plaintiff,                | : | Docket No.: C-2018-2623952     |
|                           | : |                                |
| vs.                       | : |                                |
|                           | : |                                |
| UPTOWN LIMOUSINE AND      | : |                                |
| CAR SERVICE, LLC          | : |                                |
|                           | : |                                |
| Defendant,                | : |                                |

**ANSWER TO PLAINTIFF'S COMPLAINT WITH NEW MATTER**

AND NOW COMES, Uptown Limousine and Car Service, LLC, and files the within Answer and New Matter to the Complaint of the Pennsylvania Public Utility Commission, Bureau of Investigation and Enforcement, as set forth and avers as follows:

1. Admitted upon information and belief.
2. Admitted upon information and belief.
3. Denied. To the extent that this pleading references a letter from the Commission, said letter is a document and speaks for itself and no response to the pleading is required.
4. Denied. To the extent that this pleading references trip sheets/logs, said logs are documents and speak for themselves and no response to the pleading is required.
5. Denied as a conclusion of law.

WHEREFORE, Respondent Uptown Limousine and Car Service respectfully request the Complaint be dismissed and an Order be entered in favor of Respondent and against Petitioner.

**NEW MATTER**

6. Paragraphs one (1) through five (5) are incorporated as though fully set forth herein.
7. It is unnecessary to impose any fine or penalty on Respondent to ensure compliance.
8. It is unnecessary to cancel the Certificate of Public Convenience as Respondent is and will remain in compliance with PUC regulations.

WHEREFORE, Respondent Uptown Limousine and Car Service, LLC, respectfully requests that the Complaint be dismissed and that an Order be entered in favor of Respondent and against Petitioner.

Respectfully Submitted,

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

Russell E. Farbiarz, Esquire  
Antanavage Farbiarz, PLLC  
Attorneys for Defendants

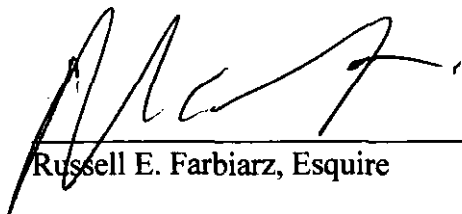
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**VERIFICATION**

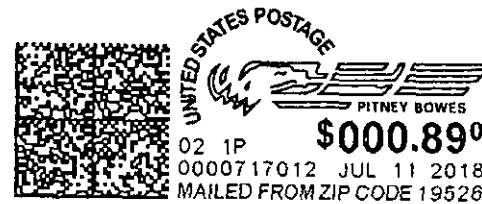
I am RUSSELL E. FARBIARZ, ESQ., Counsel for Respondent in the within instrument.

I hereby verify that the facts set forth therein are within my knowledge as counsel and are true and correct to the best of my knowledge, information and belief and that this verification is made subject to the penalties of 18 Pa.C.S.A. § 4904 relating to unsworn falsification to authorities.

Dated: 7-10-18

  
\_\_\_\_\_  
Russell E. Farbiarz, Esquire

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