

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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IN RE: APPLICATION OF : PUC DOCKET  
METRO TRANSPORATION LLC : NO.: A-2019-3011470

AND

IN RE: YOURWAY TAXI AND LIMO, INC. : PUC COMPLAINT DOCKET  
vs. : NO.: \_\_\_\_\_  
METRO TRANSPORATION LLC :

**MOTION TO CONSOLIDATE**

AND NOW, comes YOURWAY TAXI AND LIMO, INC. ("Protestant/Complainant"), by and through their Attorneys, Richard T. Mulcahey, Jr., Schubert, Gallagher, Tyler & Mulcahey, to move pursuant to 52 Pa. Code Section 5.81, to have the above-captioned cases consolidated, and in support thereof, aver:

1. Metro Transportation LLC ("Applicant/Respondent) filed on July 8, 2019, an Application for Motor Common Carrier of Persons upon Call or Demand (Taxi Service), at PUC Docket Number A-2019-3011470, for additional authority, to wit: Lehigh County, Northampton County, Bucks County, Schuylkill County, Carbon County and Monroe County.

2. Protestant/Complainant filed a Protest on or about August 12, 2019, against Applicant/Respondent contesting Applicant's/Respondent's fitness, in part, for its unlicensed and unlawful operations in the Commonwealth of Pennsylvania.

3. The Application has been assigned to Honorable Joel H. Cheskis, Deputy Chief ALJ, and an Initial Hearing has been scheduled for Tuesday, November 5, 2019, and Protestant/Complainant has requested that the Initial Hearing be converted to a telephonic pre-hearing conference.

4. Along with this Motion, Protestant/Complainant has filed a Formal Complaint against Applicant/Respondent, for unlawful transportation for compensation within Pennsylvania rendered by Applicant/Respondent.


5. Protestant/Complainant is of the opinion that the Application and Formal Complaint cases should be consolidated because both matters directly involve Applicant's lack of fitness as an unlawful operator of a call or demand service within Pennsylvania.

6. The Application and Formal Complaint cases will involve common issues of law and fact such that economy of administration of these cases will be best served by hearing evidence from common witnesses during a single proceeding.

7. Consolidation of the said cases will not delay the proceedings.

WHEREFORE, Yourway Taxi and Limo, Inc. respectfully request the consolidation of the Application and Formal Complaint cases.

Respectfully submitted,

BY: 

RICHARD T. MULCAHEY, JR., ESQ.  
SCHUBERT, GALLAGHER,  
TYLER & MULCAHEY  
Attorneys for Protestants and Complainants  
121 South Broad Street, 20<sup>th</sup> Floor  
Philadelphia, PA 19102-1890  
(215) 587-0107

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**CERTIFICATE OF SERVICE**

I, RICHARD T. MULCAHEY, JR., hereby certify that on this date I forwarded, by first-class mail, postage pre-paid, a true and correct copy of the foregoing Motion to Consolidate filed on behalf of Protestant/Complainant, YOURWAY TAXI AND LIMO, INC., to the following parties:

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

Honorable Joel H. Cheskis,  
Deputy Chief Administrative Law Judge  
PA Public Utility Commission  
400 North Street  
Harrisburg, PA 17120  
Via US Regular Mail and Email

Mr. Kusa Tolla  
Metro Transportation LLC  
915 Hamilton Street #278  
Allentown, PA 18101

Yourway Taxi and Limo., Inc  
6681 Snowdrift Road  
Allentown, PA 18106

Date: 10/18/19

  
\_\_\_\_\_  
RICHARD T. MULCAHEY, JR.

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