

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of : Commission Docket No.:  
Reading Checker Cabs, LLC : A-2020-3020872

**PROTESTANTS KEYSTONE CAB SERVICE INC., AMIGO CAB LLC, BEST TAXI  
LLC, EZ TAXI LLC, GOOD CAB LLC, EXPRESS TAXI LLC, NEW TAXI LLC, OK  
TAXI LLC, READING CITY CAB LLC, AND UNITED CAB LLC'S MOTION TO  
DISMISS APPLICATION OF APPLICANT ALL READING CHECKER CABS,  
LLC**

**NOTICE TO PLEAD/DEFEND**

A PROTEST HAS BEEN FILED REGARDING YOUR APPLICATION, FOR FAILURE TO COMPLY WITH DISCOVERY REQUESTS UNDER 52 Pa.Code § 5.371. If you wish to defend against the claims set forth in the following pages, you must take action within ten (10) days after this Motion to Dismiss are served, by entering a written appearance personally or by attorney and filing in writing with the Administrative Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Administrative Court without further notice for any money claimed in the Motion to Dismiss or for any other claim or relief requested by the Protestants. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER,  
GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH  
INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH  
INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A  
REDUCED FEE OR NO FEE.

PENNSYLVANIA BAR ASSOCIATES LAWYER REFERRAL SERVICE  
100 South Street Harrisburg, PA 17101  
(717) 238-6807

**AVISO**

Si usted desea defenderse de las demandas que se presentan más adelante en las siguientes páginas, debe tomar acción dentro de los próximos veinte (20) días después de la notificación de esta Demanda y Aviso radicando personalmente o por medio de un abogado una comparecencia escrita y radicando en la Corte por escrito sus defensas de, y objeciones a, las demandas presentadas aquí en contra suya. Se le advierte de que si usted falla de tomar acción como se describe anteriormente, el caso puede proceder sin usted y un fallo por cualquier suma de dinero reclamada en la demanda o cualquier otra reclamación o remedio solicitado por el demandante puede ser dictado en contra suya por la Corte sin más aviso adicional. Usted puede perder dinero o propiedad u otros derechos importantes para usted.

USTED DEBE LLEVAR ESTE DOCUMENTO A SU ABOGADO INMEDIATAMENTE. SI USTED NO TIENE UN ABOGADO, LLAME O VAYA A LA SIGUIENTE OFICINA. ESTA OFICINA PUEDE PROVEERLE INFORMACION A CERCA DE COMO CONSEGUIR UN ABOGADO.

SI USTED NO PUEDE PAGAR POR LOS SERVICIOS DE UN ABOGADO, ES POSIBLE QUE ESTA OFICINA LE PUEDA PROVEER INFORMACION SOBRE AGENCIAS QUE OFREZCAN SERVICIOS LEGALES SIN CARGO O BAJO COSTO A PERSONAS QUE CUALIFICAN.

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100 South Street Harrisburg, PA 17101  
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Dated: November 13, 2020

**STEPHEN HICKEY, ESQUIRE**

By: /s/ Stephen Hickey

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Service Inc., Amigo Cab LLC, Best Taxi  
LLC, EZ Taxi LLC, Good Cab LLC,  
Express Taxi LLC, New Taxi LLC, OK  
Taxi LLC, Reading City Cab LLC, and  
United Cab LLC  
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Keystone Cab Service, Inc., Amigo Cab LLC, Best Taxi LLC, EZ Taxi LLC, Good Cab LLC, Express Taxi LLC, New Taxi LLC, OK Taxi LLC, Reading City Cab LLC, and United Cab LLC (“Protestants”), file this Motion to Dismiss the application of Applicant Reading Checker Cabs, LLC (“Reading Checker” or “Applicant”) pursuant to the Discovery rules promulgated by the Pennsylvania Public Utility Commission (the “Commission”) at 52 Pa.Code §5.371. In support thereof, Protestants submit the following:

1. On or about July 16, 2020, Applicant filed an Application for Motor Common Carrier of Persons upon Call or Demand (Taxi Service).
2. Applicant’s Application was published in the *Pennsylvania Bulletin* on August 1, 2020.
3. On August 20, 2020, Protestants timely filed its protest.
4. On October 22, 2020, Protestant served Applicant with Protestants’ first set of interrogatories. The discovery request contained a Notice indicating that a response was due within twenty (20) days of service
5. As of the date of this Motion, over twenty days has passed since discovery was served. To this point, Applicant has not provided any responses, answers, or objections to the aforementioned discovery request.





