

November 16, 2020

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
2nd Floor, Room-N201
Harrisburg, PA 17120

**RE: Application of We C.A.R.E. Transportation Services LLC
Docket No. A-2020-3020503**

Dear Secretary Chiavetta:

Enclosed please find for refiling a revised Uncontested Motion for Continuance of Hearing with the corrected docket number on all pages, again filed on behalf of We C.A.R.E. Transportation Services LLC in the above-captioned matter. I originally attempted to file a copy of this Uncontested Motion on November 12, 2020, but it was rejected due to an incorrect docket number. A copy of this document has again been served upon opposing counsel and Administrative Law Judge F. Joseph Brady in accordance with Commission regulations.

Please feel free to contact me if you have any questions.

Sincerely,
/s/ Paul Shane Miller
Paul Shane Miller
Attorney for We C.A.R.E. Transportation Services LLC

Jeremy V. Farrell
Attorney for We C.A.R.E. Transportation Services LLC

Enclosure

cc: Tanya Leshko, Esq. (with enclosure) (via e-mail)
Thomas T. Niesen, Esq. (with enclosure) (via e-mail)
Administrative Law Judge F. Joseph Brady (with enclosure) (via e-mail)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of :
We C.A.R.E. Transportation Services LLC : Docket No. A-2020-3020503

**UNCONTESTED MOTION FOR
CONTINUANCE OF HEARING**

Filed on Behalf of We C.A.R.E.
Transportation Services LLC

Counsel of Record for this Party:

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(412) 566-1212

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of :
We C.A.R.E. Transportation Services LLC : Docket No. A-2020-3020503

UNCONTESTED MOTION FOR CONTINUANCE OF HEARING

TO THE HONORABLE COMMISSION:

We C.A.R.E. Transportation Services LLC, by and through its respective attorneys, file this Uncontested Motion for Continuance of Hearing in accordance with 52 Pa. Code § 1.15(a)(1).

1. An initial telephonic hearing is currently scheduled to take place on Thursday, November 19, 2020 at 10:00 a.m.

2. Counsel for We C.A.R.E. Transportation Services LLC (We C.A.R.E.) was retained on November 10, 2020 and has not had sufficient time to prepare for the scheduled hearing.

3. Counsel for We C.A.R.E. contacted counsel for the protesting parties by e-mail on November 10, 2020 to inquire as to whether they would consent to a 45-60 day continuance of the hearing in this matter.

4. Counsel for We C.A.R.E. subsequently spoke to counsel for the protesting parties by phone and discussed a continuance of the hearing in this matter.

5. Counsel for the protesting parties informed We C.A.R.E.'s counsel that they do not object to the continuance request.

6. We C.A.R.E.'s counsel contends that a continuance of 60 days is appropriate in this case for two reasons. One, the parties intend to explore settlement,

which could either limit the issues that need to be addressed at the hearing or obviate the need for a hearing altogether. Second, a continuance would give counsel for We C.A.R.E. adequate time to get up to speed on the case.

7. Therefore, We C.A.R.E. respectfully requests that the hearing be continued for 60 days.

WHEREFORE, We C.A.R.E. Transportation Services LLC respectfully requests a 60 day continuance of the currently scheduled hearing date.

TUCKER ARENSBERG, P.C.

BY: Paul Shane Miller, Esquire

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing Uncontested Motion for Continuance of Hearing upon the participants listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant):

Administrative Law Judge F. Joseph Brady
Pennsylvania Public Utility Commission
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801 Market Street
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(via e-mail at pmcneal@pa.gov)

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Date: November 16, 2020

/s/ Paul Shane Miller

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