

COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

**IN RE: Application of Paragon Transportation LLC      Docket No.: A-2020-3022989**

**PETITION FOR RECONSIDERATION**

AND NOW, comes applicant, Paragon Transportation LLC, by and through its counsel, William A. Buck, Esquire, of Leech, Tishman, Fuscaldo & Lampl, LLC, and hereby files the instant Petition for Reconsideration averring in support thereof as follows:

1. On November 23, 2020, Paragon Transportation LLC (“Applicant”) filed its Motor Common Carrier of Persons in Group and Party Service Vehicles Seating 11 to 15 Passengers, Including the Driver application (“Application”) with the Pennsylvania Public Utility Commission (“Agency”).
2. By letter dated November 25, 2020 the Agency requested clarifying information regarding the originating points of service that the Applicant intended to provide, which was to be provided within ten (10) days from the date of the information request.
3. The information request was inadvertently overlooked and by way of letter dated December 31, 2020, the Agency notified counsel for Applicant that Applicant’s Application was denied for the failure to respond to the information request timely.
4. Concurrently with this Application, counsel for Applicant shall file a response to the information request, a true and correct copy of which is attached hereto and incorporated herein as Exhibit “A” (“Response”).
5. As detailed in the attached Response, Applicant’s description of its service area is clarified as follows:

*The service provided by Applicant will originate from points within Allegheny County and will deliver to points within Pennsylvania, excluding areas under the jurisdiction of the Philadelphia Parking Authority.*

6. As Applicant has now remedied its failure to provide the clarifying information requested, Applicant respectfully requests that the Agency reconsider its denial of the Applicant's Application and grant its Application.

Respectfully submitted,

LEECH, TISHMAN, FUSCALDO &  
LAMPL, LLC.



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William A. Buck, Esquire  
Counsel for Applicant

January 12, 2020

Commonwealth of Pennsylvania  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120

**RE: Docket No. A-2020-3022989**  
**Application of Paragon Transportation LLC, 51 Pennwood Place, Suite 200,**  
**Warrendale, Allegheny County, PA 15066. 724-772-9020**

Dear Sir or Madam,

Please be advised that our firm represents Paragon Transportation LLC ("Paragon"). On or around November 23, 2020 Paragon filed an application for Motor Common Carrier of Persons in Group and Party Service Vehicles Seating 11 to 15 Passengers, Including the Driver with the Pennsylvania Public Utility Commission ("Agency"). By way of letter dated November 25, 2020, the Agency requested clarifying information regarding Paragon's description of the proposed service area. By way of this letter, Paragon provides the following amended description of the proposed service area:

*The service provided by Applicant will originate from points within Allegheny County and will deliver to points within Pennsylvania, excluding areas under the jurisdiction of the Philadelphia Parking Authority.*

Attached to this letter is a verification by the Managing Member of Paragon verifying the above amended description of the proposed service area.

Please contact us with any questions or comments.

Very truly yours,



William A. Buck

VERIFICATION

I, John M. Hess, as the Managing Member of Paragon Transportation LLC hereby state that the facts set forth in the attached letter are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

  
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John M. Hess, Managing Member