

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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**RESTRICTIVE AMENDMENT**

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AND NOW, come Applicant We C.A.R.E. Transportation Services, LLC (“Applicant”) and Rover Community Transportation, Inc., Bucks County Transport, Inc., Bux-Mont Transportation, Inc., Easton Coach Company, Suburban Transit Network, Inc., and Tri County Transit Service, Inc. (collectively, “Protestants”), by and through their respective attorneys, and file this Restrictive Amendment in the above-captioned matter as follows:

1. Paragraph 10 of Applicant’s Application for Motor Common Carrier of Persons in Paratransit Service (“Application”), which was filed with the Pennsylvania Public Utility Commission (“Commission”) in the above-captioned matter on June 24, 2020, is hereby amended to clearly identify and specify the territory requested so that the authority sought shall read as follows:

To transport, as a common carrier, by motor vehicle, persons, in paratransit service, limited to mobility challenged people who receive services from We C.A.R.E Home Health Agency LLC, between points in the Counties of Bucks, Chester, Delaware, Montgomery, and Philadelphia.

2. Based upon the Restrictive Amendment set forth in Paragraph 1 above, and conditioned upon its acceptance and approval by the Pennsylvania Public Utility Commission (“Commission”) and any order issued being consistent therewith, Protestants agree to withdraw their respective Protests to the Application, as amended, subject to the following two conditions and requirements: (i) in the event that any aspect of this Restrictive Amendment is rejected by the Commission for any reason, the Protestants’ respective Protests shall be deemed immediately reinstated and this proceeding shall be promptly scheduled for hearing to permit

the Parties to present evidence and/or testimony in an on-the-record hearing in favor of or in opposition to approval of the Application, and neither the Restrictive Amendment, nor the fact that the Parties agreed to submit it to the Commission, shall be used against any party in any such hearing or proceeding; and (ii) in the event that any aspect of this Restrictive Amendment is rejected by the Commission for any reason, the Parties shall have the right to request reconsideration before the Commission or to appeal before any and all appropriate courts, or both.

3. The Restrictive Amendment is in the public interest because it will allow the Applicant to begin providing paratransit service while avoiding the time and expense of further litigation.

4. Protestants desire to remain parties of record so as to receive copies of any orders or other documentation issued by the Commission in the proceeding.

5. Counsel for Applicant and the Protestors have reviewed this Restrictive Amendment with their respective clients and represent that their clients have consented to its provisions.

WHEREFORE, the parties, in consideration of the promises mutually set forth above and intending to be legally bound, have executed this Restrictive Amendment as of this 15th day of January, 2021.

**WE C.A.R.E. TRANSPORTATION  
SERVICES, LLC**

By /s/ Paul Shane Miller

Paul Shane Miller, Esq.  
TUCKER ARENSBERG, PC  
1500 One PPG Place  
Pittsburgh, PA 15221

*Attorney for Applicant  
We C.A.R.E. Transportation Services, LLC*

**ROVER COMMUNITY  
TRANSPORTATION, INC.**

By /s/ Thomas T. Niesen

Thomas T. Niesen, Esq.  
THOMAS, NIESEN & THOMAS, LLC  
212 Locust Street, Suite 302  
Harrisburg, PA 17101

*Attorney for Protestant  
Rover Community Transportation, Inc.*

**BUCKS COUNTY TRANSPORT, INC.,  
BUX-MONT TRANSPORTATION, INC.,  
EASTON COACH COMPANY,  
SUBURBAN TRANSIT NETWORK, INC.  
AND TRI COUNTY TRANSIT SERVICE, INC.**

By /s/ Tanya C. Leshko

Tanya C. Leshko, Esq.  
BUCHANAN INGERSOLL & ROONEY  
409 North Second Street, Suite 500  
Harrisburg, PA 17101

*Attorney for Bucks County Transport, Inc.,  
Bux-Mont Transportation, Inc., Easton  
Coach Company, Suburban Transit  
Network, Inc. and Tri County Transit  
Service, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that I have this 15<sup>th</sup> day of January, 2021, served a true and correct copy of the foregoing Restrictive Amendment upon the persons listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant):

Via Electronic Mail

Administrative Law Judge Darlene Heep  
Pennsylvania Public Utility Commission  
801 Market Street  
Philadelphia, PA 19107  
(via email at [pmcneal@pa.gov](mailto:pmcneal@pa.gov))

Tanya C. Leshko, Esq.  
BUCHANAN INGERSOLL & ROONEY  
409 North Second Street, Suite 500  
Harrisburg, PA 17101  
(via email at [tanya.leshko@bipc.com](mailto:tanya.leshko@bipc.com))

Thomas Niesen, Esq.  
THOMAS, NIESEN & THOMAS, LLC  
212 Locust Street, Suite 302  
Harrisburg, PA 17101  
(via email at [tniesen@tntlawfirm.com](mailto:tniesen@tntlawfirm.com))

/s/ Paul Shane Miller  
Paul Shane Miller, Esquire