

# Buchanan

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March 29, 2022

**VIA E-FILING**

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

Re: Application of Family Care For You, LLC, t/a Family Care For You;  
Docket No. A-2021-3029529

Dear Secretary Chiavetta:

Enclosed for filing please find the Restrictive Amendment between the Applicant, Family Care For You, LLC, t/a Family Care For You and Joint Protestants, Bucks County Transport, Inc., Bux-Mont Transportation, Inc., Easton Coach Company, Suburban Transit Network, Inc., and Tri County Transit Service, Inc. in the above-captioned proceeding.

Copies are being served in accordance with the attached Certificate of Service. Please contact me with any questions or concerns.

Respectfully submitted,



Tanya C. Leshko

TCL/tlg  
Enclosure  
cc: Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Family Care For You, LLC, :  
t/a Family Care For You for authority to :  
transport, as a common carrier, by motor : Docket No. A-2021-3029529  
vehicle, persons in paratransit service, from :  
points in the Counties of Berks, Bucks, :  
Delaware, Lancaster, Lehigh and :  
Montgomery and the City and County of :  
Philadelphia to points in Pennsylvania, and :  
return. :

**RESTRICTIVE AMENDMENT AND STIPULATION**

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AND NOW, come Applicant Family Care For You, LLC, t/a Family Care For You (“Applicant”), and Joint Protestants Bucks County Transport, Inc., Bux-Mont Transportation, Inc., Easton Coach Company, Suburban Transit Network, Inc. and Tri County Transit Service, Inc. (“Joint Protestants”), by and through their respective attorneys, and file this Restrictive Amendment and Stipulation in the above-captioned matter as follows:

1. The above-captioned Application 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 vehicles, persons in paratransit service who receive home care from Family Care for You LLC dba Family Care for You in the form of personal care services reimbursed under a Medicaid Waiver program (including managed care) from points originating in Bucks County to points in Pennsylvania and return; and persons who reside in the Counties of Philadelphia, Berks, Lehigh and Lancaster to points in Pennsylvania and return.

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, Joint 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 and Stipulation is rejected by the Commission for any reason, the Protests shall be deemed immediately reinstated, this proceeding shall be scheduled for hearing to permit Joint Protestants to present evidence in an on-the-record proceeding 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 subsequent hearing or proceeding; and (ii) in the event that any aspect of this Restrictive Amendment and Stipulation is rejected by the Commission for any reason, the Joint Protestants shall have the right to request reconsideration before the Commission or to appeal before any and all appropriate courts, or both, and in any such proceedings Applicant shall not raise any objections as to party status or standing of the Joint Protestants.

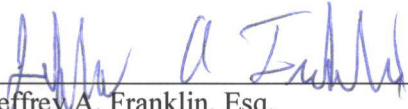
3. The Restrictive Amendment set forth in Paragraph 1 is in the public interest because it will allow the Applicant to provide paratransit service in a manner consistent with its operating objectives, and it will resolve the Protests to the Application while avoiding the time and expense of further litigation.

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

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 28th day of March, 2022.

**FAMILY CARE FOR YOU, LLC, T/A  
FAMILY CARE FOR YOU**

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

By   
Jeffrey A. Franklin, Esq.  
Prince Law Offices, P.C.  
646 Lenape Road  
Bechtelsville, PA 19505

*Attorney for Family Care for You, LLC*

By \_\_\_\_\_  
Tanya C. Leshko, Esquire  
BUCHANAN INGERSOLL & ROONEY  
409 North Second Street, Suite 500  
Harrisburg, PA 17101

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

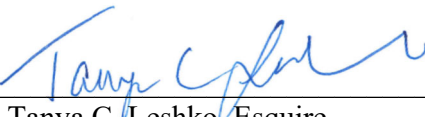
WHEREFORE, the parties, in consideration of the promises mutually set forth above and intending to be legally bound, have executed this Restrictive Amendment as of this 29th day of March, 2022.

**FAMILY CARE FOR YOU, LLC, T/A  
FAMILY CARE FOR YOU**

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

By \_\_\_\_\_  
Jeffrey A. Franklin, Esq.  
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646 Lenape Road  
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*Attorney for Family Care for You, LLC*

By  \_\_\_\_\_  
Tanya C. Leshko, Esquire  
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Harrisburg, PA 17101

*Attorney for Joint Protestants  
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 29th day of March, 2022, 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:**

Hon. Elizabeth Barnes  
Administrative Law Judge  
Commonwealth of Pennsylvania  
Pennsylvania Public Utility Commission  
400 North Street, 2<sup>nd</sup> Floor West  
Harrisburg, PA 17120  
[ebarnes@pa.gov](mailto:ebarnes@pa.gov)

Jeffrey A. Franklin, Esq.  
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Bechtelsville, PA 19505  
[jfranklin@princelaw.com](mailto:jfranklin@princelaw.com)  
*Attorney for Family Care for You, LLC*



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Tanya C. Leshko, Esquire