

Buchanan

Ingersoll · Rooney

Tanya C. Leshko
717 237 4868
tanya.leshko@bipc.com

409 North Second Street
Suite 500
Harrisburg, PA 17101-1357
T 717 237 4800
F 717 233 0852

July 21, 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 Loving Care Senior Services, Inc.;
Docket No. A-2022-3032725

Dear Secretary Chiavetta:

Enclosed for filing please find the Restrictive Amendment between the Applicant, Loving Care Senior Services, Inc. and Joint Protestants, 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 Loving Care Senior Services, Inc. for the right to begin to transport, as a common carrier, by motor vehicles, persons in paratransit service, from points in Montgomery County and the City and County of Philadelphia, excluding areas under the jurisdiction of the Philadelphia Parking Authority.	: : : : : : : : : : :	Docket No. A-2022-3032725
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RESTRICTIVE AMENDMENT AND STIPULATION

AND NOW, come Applicant Loving Care Senior Services, Inc. (“Applicant”), and Joint Protestants 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 persons, by motor vehicle, in paratransit service, from points in the City and County of Philadelphia, 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,

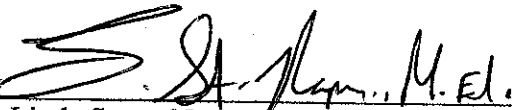
and neither the Restrictive Amendment, nor the fact that the parties agreed to submit it to the Commission, shall be used against any party in any subsequent hearing or proceeding; and (ii) in the event that any aspect of this Restrictive Amendment and Stipulation is rejected by the Commission for any 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.

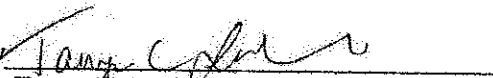
WHEREFORE, the parties, in consideration of the promises mutually set forth above and intending to be legally bound, have executed this Restrictive Amendment as of this 21 day of July, 2022.

LOVING CARE SENIOR SERVICES, INC.

By 

Linda Stone-Napper, M.Ed, President
Loving Care Senior Services, Inc.
305 York Road, Suite 300 & 310
Jenkintown, PA 19046

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

By 

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

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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Loving Care Senior Services, :
Inc. for the right to begin to transport, as a :
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in paratransit service, from points in :
Montgomery County and the City and :
County of Philadelphia, excluding areas :
under the jurisdiction of the Philadelphia :
Parking Authority. :

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the foregoing document upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code § 1.54.

Via Email:

Linda Stone-Napper, M.Ed, President
Loving Care Senior Services, Inc.
305 York Road, Suite 300 & 310
Jenkintown, PA 19046
lovingcaresvs@aol.com

Date: July 21, 2022



Tanya C. Leshko