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July 29, 2022

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania, Public Utility Commission
Commonwealth Keystone Building
400 North Street, Filing Room
Harrisburg, PA 17120

RE: Application of All Blue Taxi, LLC to transport, as a common carrier,
By motor vehicle, persons in paratransit service from points in the counties of
Adams, Berks, Lancaster and York, to points in Pennsylvania and return.
Docket No. A-2022-3031757; A-6319220

Dear Secretary Chiavetta,

Please find enclosed a Petition by All Blue Taxi, LLC seeking a 45-day extension of time to file a corrected Form E, proof of insurance coverage as it appears that the prior submitted coverage was inadvertently not the proper coverage.

Feel free to contact me with any questions or concerns.

Sincerely,

A handwritten signature in blue ink that reads "Ali M. Audi".

Ali M. Audi, Esquire
Audi Law PLLC
Counsel for Applicant

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

APPLICATION OF ALL BLUE TAXI, LLC TO	:	
TRANSPORT, AS A COMMON CARRIER, BY	:	
MOTOR VEHICLE, PERSONS IN	:	
PARATRANSIT SERVICE FROM POINTS	:	DOCKET NO. A-2022-3031757
IN THE COUNTIES OF ADAMS,	:	
BERKS, LANCASTER AND YORK, TO POINTS	:	A-6319220
IN PENNSYLVANIA AND RETURN.	:	
	:	
ALL BLUE TAXI SERVICE LLC	:	
1000 SCENERY DRIVE	:	
HARRISBURG PA 17109	:	

PETITION FOR EXTENSION OF TIME TO FILE INSURANCE
CERTIFICATE REQUIRED UNDER 52 Pa. Code §32 et. seq.

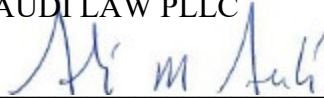
All Blue Taxi, LLC, 1000 Scenery Drive, Harrisburg, Pennsylvania, a Pennsylvania licensed Motor Carrier, by and through its attorney, Ali M. Audi, Esquire of Audi Law PLLC, hereby petitions the Commission for an extension of time to file the required insurance certificates for the reasons stated below:

1. All Blue Taxi, LLC is a Pennsylvania limited liability company with a primary address of 1000 Scenery Drive, Harrisburg, PA, 17109.
2. Petitioner's only member is Hafes Aly, an adult individual.
3. Petitioner first received a Certificate of Public Convenience to operate as a motor carrier providing Taxi Service from points in Berks and Lancaster Counties to points in Pennsylvania and return on April 19, 2018.
4. Petitioner's PUC number is A-6319220.
5. On April 6, 2022, Petitioner filed an application to also begin Paratransit Service from points in the Counties of Adams, Berks, Lancaster and York, to points in Pennsylvania and Return.
6. By Secretarial Letter, dated May 31, 2022, Petitioners application was approved pending receipt of a Form E showing insurance coverage and an approved Tariff by July 31, 2022.

7. Upon information and belief, Petitioner's insurer submitted the Form E and confirmed same to Petitioner.
8. Petitioner's Tariff was submitted and approved with a filing date of June 29, 2022.
9. Petitioner's Paratransit Certificate was granted on July 27, 2022.
10. On July 29, 2022, Petitioner was notified that the Form E submitted by his insurer in fact did not contain the correct insurance coverage for a Paratransit licensee.
11. Petitioner's insurance broker has assured him that they can obtain the correct coverage, they just do not believe that they can do so by the required deadline of July 31, 2022.
12. Petitioner has a Paratransit Certificate, with necessary insurance coverage, for another entity, Discount Cab Service, LLC (A-6310309), and therefore believes that he will be able to obtain and afford insurance coverage for this entity.
13. Petitioner is requesting an extension of time, for a period of Forty-Five (45) days, in order to acquire the proper insurance and submit a corrected Form E.
14. Petitioner will not operate as a Paratransit carrier until the proper insurance is submitted.
15. There is no prejudice to the public, or any other entity, by providing Petitioner with this extension.

WHEREFORE, Petitioner, All Blue Taxi, LLC, requests that the Commission grant him a 45-day extension in order to procure and file a corrected Form E with insurance coverage for Paratransit Transportation.

RESPECTFULLY SUBMITTED
AUDI LAW PLLC



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