

# Buchanan

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August 24, 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 Shams Transportation LLC;  
Docket No. A-2022-3031140

Dear Secretary Chiavetta:

Enclosed for filing please find the Restrictive Amendment between the Applicant, Shams Transportation LLC and Joint Protestants, Bucks County Transport, Inc., Bux-Mont Transportation, Inc., Easton Coach Company, Suburban Transit Network, Inc., Tri County Transit Service, Inc. and Rover Community Transportation, 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 Shams Transportation LLC :  
for authority to transport, as a common :  
carrier, by motor vehicle, persons in : Docket No. A-2022-3031140  
paratransit service, between points in the :  
Counties of Bucks, Chester, Delaware and :  
Montgomery and the City and County of :  
Philadelphia. :

**RESTRICTIVE AMENDMENT AND STIPULATION**

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AND NOW, come Applicant Shams Transportation LLC (“Applicant”), and Joint Protestants Bucks County Transport, Inc., Bux-Mont Transportation, Inc., Easton Coach Company, Suburban Transit Network, Inc., Tri County Transit Service, Inc. and Rover Community Transportation, 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 vehicle, persons in paratransit service, among and between points in the County of Delaware and the City and County of 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, 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 24 day of August, 2022.

**SHAMS TRANSPORTATION LLC**

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

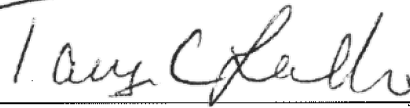
By



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Gallagher Law PC  
1600 Market Street  
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*Attorney for Mohamed Shamseldin*

By



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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., Tri County  
Transit Service, Inc. and Rover Community  
Transportation, Inc.*

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Counties of Bucks, Chester, Delaware and :  
Montgomery and the City and County of :  
Philadelphia. :

**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:**

Hon. Jeffrey Watson  
Administrative Law Judge  
Commonwealth of Pennsylvania  
Pennsylvania Public Utility Commission  
301 Fifth Ave. # 220  
Pittsburgh, PA 15222  
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Date: August 24, 2022

  
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Tanya C. Leshko