

# Buchanan

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September 19, 2023

**VIA E-FILING**

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

Re: Application of Mohammad Hassan;  
Docket No. A-2023-3040823

Dear Secretary Chiavetta:

Enclosed for filing please find the Restrictive Amendment between the Applicant, Mohammad Hassan 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/kas  
Enclosure  
cc: Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Mohammad Hassan for the :  
right to begin to transport, as a common :  
carrier, by motor vehicle, persons in : Docket No. A-2023-3040823  
paratransit service, between points in the :  
Counties of Berks, Bucks, Chester, Delaware :  
and Montgomery, and the City and County of :  
Philadelphia. :

**RESTRICTIVE AMENDMENT AND STIPULATION**

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AND NOW, comes Applicant Mohammad Hassan (“Applicant”), and Joint Protestants Bucks County Transportation, 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:

**For the right to begin to transport, as a common carrier, by motor vehicle, persons in paratransit service from points within and between the counties of Berks, Chester, Delaware and the city and county of Philadelphia; and from the counties of Berks, Chester, Delaware and the city and county of Philadelphia to points within Montgomery and Bucks counties 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 19<sup>th</sup> day of September 2023.

**MOHAMMAD HASSAN**

By   
Mohammad Hassan  
637 Magee Avenue  
Philadelphia, PA 19111

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

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by motor vehicle, persons in paratransit : Docket No. A-2023-3040823  
service, between points in the Counties of :  
Berks, Bucks, Chester, Delaware and :  
Montgomery, and the City of 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 Eranda Vero  
Administrative Law Judge  
Commonwealth of Pennsylvania  
Pennsylvania Public Utility Commission  
801 Market Street, 4<sup>th</sup> Floor, Suite 4063  
Philadelphia, PA 19107  
[evero@pa.gov](mailto:evero@pa.gov)

Mohammad Hassan  
637 Magee Avenue  
Philadelphia, PA 19111  
[hmoatmen@icloud.com](mailto:hmoatmen@icloud.com)

Date: September 19, 2023

  
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Tanya C. Leshko