

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Heartland Medical :  
Transportation, Inc. to transport, as a :  
common carrier, by motor vehicle, :  
persons in paratransit service, from points :       Docket No. A-2023-3041628  
in the Counties of Bucks, Chester and :  
Montgomery, to points in Pennsylvania, :  
and return. :

**REQUEST FOR CONTINUANCE BY  
HEARTLAND MEDICAL TRANSPORTATION, INC.**

Heartland Medical Transportation, Inc. respectfully files this Request or Continuance and in support thereof, avers as follows:

1. There is currently scheduled before this Honorable Court on Tuesday, November 7, 2023 at 10:00 a.m. with reference to the Joint Protest filed by Bucks County Transport, Inc. (“BCT”), Bux-Mont Transportation, Inc. (“Bux-Mont”), Easton Coach Company (“Easton”), Suburban Transit Network, Inc. (“TransNet”), and Tri County Transit Service, Inc. (“Tri County”) (collectively, the “Joint Protestants”).

2. Counsel for Heartland Medical Transportation, Inc. respectfully requests that a continuance of the hearing scheduled for November 7, 2023 at 10:00 a.m. be granted. Counsel for Heartland Medical Transportation, Inc. has three matters that are scheduled for November 7, 2023 in the U.S. Bankruptcy Court for the Middle District of Pennsylvania.

Two of these matters have been scheduled for quite some time, and undersigned counsel was hopeful each of them would settle. Unfortunately, neither has at this time. For one of these matters undersigned counsel represents a Debtor and for the other matter undersigned counsel represents a Creditor.

After more than two years of trial, the third matter was recently adjudicated as an involuntary bankruptcy and a hearing was scheduled on this same day and time with reference

to the bankrupt entity's attorney requesting to withdraw as counsel. Undersigned counsel currently represents the Chapter 7 Trustee in this matter and will likely be appointed as the actual Chapter 7 Trustee some time next month.

It is imperative that undersigned counsel be present for all three of the hearing scheduled in bankruptcy court on Tuesday, November 7, 2023.

3. Undersigned counsel has contacted Attorney Tanya C. Leshko, counsel for the protestors requesting concurrence in this Request for Continuance. Attorney Leshko has graciously agreed to the Request for Continuance.

WHEREFORE, for the foregoing reasons, undersigned counsel and Heartland Medical Transportation, Inc. respectfully requests this Honorable Court grant the Request for Continuance and grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

DURKIN LAW, LLC

\_\_\_\_s/ Jill E. Durkin\_\_\_\_\_  
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Attorney for Heartland Medical  
Transportation, Inc.

Dated: October 30, 2023

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**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:**

Tanya C. Leshko, Esquire  
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Dae: October 30, 2023

\_\_\_\_s/ Jill E. Durkin\_\_\_\_\_  
Jill E. Durkin