

Buchanan

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

November 14, 2024

VIA E-FILING

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

Re: Application of Blackhorse Empire, LLC
Docket No: A-2024-3050285

Dear Secretary Chiavetta:

Enclosed for electronic filing please find Joint Protestants Bucks County Transport, Inc., Bux-Mont Transportation, Easton Coach Company, Suburban Transit Network, Inc. and Tri County Transit Service, Inc. Motion to Compel Applicant to Respond to Requests for Discovery in the above-captioned proceeding.

Copies are being served in accordance with the attached Certificate of Service. Please contact me with any questions.

Respectfully submitted,



Tanya C. Leshko

TCL/ja

Enclosure
cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Blackhorse Empire, LLC to :
transport, as a common carrier, by motor :
vehicle, persons in paratransit service, : Docket No. A-2024-3050285
between points in the Counties of Berks, :
Bucks, Chester, Delaware, Huntingdon, :
Montgomery and Susquehanna, and the City :
and County of Philadelphia. :

**JOINT PROTESTANTS’ MOTION TO COMPEL APPLICANT TO RESPOND TO
REQUESTS FOR DISCOVERY**

TO THE HONORABLE ERANDA VERO:

Pursuant to 52 Pa. Code § 5.103, Bucks County Transport, Inc. (“BCT”), Bux-Mont Transportation, Inc. (“Bux-Mont”), Easton Coach Company (“Easton”), Suburban Transit Network, Inc. (“TransNet”), Tri County Transit Service, Inc. (“Tri County”) collectively, “Joint Protestants”) by and through their attorneys, Tanya C. Leshko, John F. Povilaitis, Alan M. Seltzer and Buchanan Ingersoll and Rooney PC, move the Pennsylvania Public Utility Commission (“Commission”) and Administrative Law Judge (“ALJ”) Eranda Vero for the entry of an order compelling the Applicant, Blackhorse Empire, LLC (“Applicant”) to respond to discovery. In support of this Motion to Compel, Joint Protestants state as follows:

I. INTRODUCTION AND PROCEDURAL HISTORY

1. This matter commenced on July 24, 2024, when Applicant filed an Application for Motor Common Carrier of Persons in Paratransit Service for Approval to “begin to transport, as a common carrier, by motor vehicle, persons in paratransit service, between points in the Counties of Berks, Bucks, Chester, Delaware, Huntingdon, Montgomery and Susquehanna, and the City and County of Philadelphia” at the above-captioned docket (“Application”).

2. Notice of the Application was not published in the Pennsylvania Bulletin until September 21, 2024, as the Commission had several requests for information that necessitated the provision of additional information from Applicant.

3. On October 7, 2024, Joint Protestants filed a Protest to the Application.

4. On October 22, 2024, Joint Protestants issued the First Set of Interrogatories and Request for Production of Documents to Applicant (“Set I”). See Attachment 1.

5. The certificate of service indicates that Applicant was served with Set I via e-mail and regular mail at the electronic mail and post office mailing addresses indicated in the Application. See Attachment 1.

6. On October 22, 2024, an Initial Telephonic Hearing Notice was issued by the Commission’s Office of Administrative Law Judge (“OALJ”) scheduling a hearing before the Honorable Eranda Vero on December 11, 2024.

7. On November 1, 2024, Counsel for Protestants reached out to Applicant to discuss the Protest and Set I.

8. Applicant stated that he did not intend to respond to Set I.

9. Applicant stated that he was not obligated to respond to Set I.

10. Applicant advised Counsel for Protestants that a subpoena from the judge would be necessary for Applicant to respond to Set I.

11. Applicant’s representative further advised Counsel for Protestants that Applicant would not require counsel to represent him at any further proceedings in this matter because it is a “one man operation.” Applicant was not persuaded by the stated fact that Blackhorse Empire, LLC is a limited liability company registered with the Commonwealth of Pennsylvania Department of State.

12. Pursuant to applicable Commission rules at 52 Pa. Code § 5.342(d), answers to Set I were due on November 11, 2024.

13. No formal objection to the Set I interrogatories and requests for production of documents has been received by Joint Protestants.

14. To the extent that the conversation of November 1, 2024 between Applicant and Counsel for Joint Protestants could be said to constitute an objection, there was no basis stated upon which Applicant was legitimately entitled to disregard Set I.

15. Pursuant to applicable Commission rules at 52 Pa. Code § 5.342(e), objections were due on November 1, 2024.

16. No privilege has been claimed or other objection made to any of the discovery served by Joint Protestants at any time in accordance with the rules and regulations of the Commission.

II. LEGAL STANDARDS AND ARGUMENT

17. The Commission's regulations permit the filing of a Motion to Compel with regard to discovery; however, the regulations as written contemplate that the Motion to Compel will be filed in response to an objection. 52 Pa. Code § 5.342(g).

18. No objection was ever filed to the discovery by Applicant, so no legally recognized objection exists.

19. The Commission's regulations permit the presiding officer to make an appropriate order on motion for same if "A party fails to appear, answer, file sufficient answers, file objections, make a designation or otherwise respond to discovery requests, as required under this subchapter." 52 Pa. Code § 5.371(a)(1). The sanctions which may be imposed include "entering a judgment against the disobedient party . . ." entering an order "prohibiting the [disobedient party] from

introducing in evidence designated documents, things or testimony . . .”, or the entry of “[a]n order with regard to the failure to make discovery as is just.” 52 Pa. Code § 5.372(a)(2), (3), (4).

20. The failure of Applicant to comply with any of the Commission’s rules regarding discovery, including its failure to adequately and timely respond to discovery requests or properly object, should not be excused as the vagaries of a pro se Applicant. The Interrogatories as provided clearly state when responses are due, and counsel for Joint Protestants engaged in good faith efforts to explain same.

21. Nor is the failure of Applicant to appropriately respond to requests for discovery a violation of form rather than substance. Joint Protestants are unfairly prejudiced by the failure of Applicant to provide the requested information in the time required. A hearing is presently scheduled for December 11, 2024, and Applicant has provided none of the discovery requested by Joint Protestants.

22. In the event responses to Set I are not timely provided, Applicant should be precluded by Order from testifying or otherwise introducing evidence at hearing regarding the matters contained therein.

III. CONCLUSION

For the reasons set forth above, the Joint Protestants respectfully request that the Honorable Judge Vero enter an Order compelling Applicant to fully and completely respond to Set I by December 1, 2024. Should responses to Set I be incomplete or should Applicant again refuse to respond, it is respectfully requested that an Order be entered prohibiting Applicant from addressing

in evidence the subject matter of the interrogatories or document requests to which inadequate response is made.

Respectfully submitted,

BUCHANAN INGERSOLL & ROONEY, P.C.



Tanya C. Leshko
John F. Povilaitis, Esquire
Alan M. Seltzer, Esquire
409 N. Second Street, Suite 500
Harrisburg, PA 17101-1357
717 237-4800
tanya.leshko@bipc.com
john.povilaitis@bipc.com
alan.seltzer@bipc.com

Date: November 14, 2024

ATTACHMENT 1

Buchanan

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

October 22, 2024

VIA ELECTRONIC MAIL AND REGULAR MAIL

Sylvester Thomas
238 North 12th Street
Reading, PA 196047
blackhorseempirellc@gmail.com

Re: Application of Blackhorse Empire, LLC
Docket No: A-2024-3050285

Dear Mr. Thomas:

Enclosed with this letter please find the First Set of Interrogatories and Requests for Production of Documents of Bucks County Transport, Inc., Bux-Mont Transportation, Inc., Easton Coach Company, Suburban Transit Network, Inc. and Tri County Transit Service, Inc. directed to Blackhorse Empire, LLC and issued pursuant to 52 Pa. Code § 5.321 *et seq.*

When answering each question, please be sure to indicate the name of the person responsible for answering the Interrogatory or producing the documents. Also, please attach an affidavit or verification for each person. Answers to Interrogatories are due in this office and address within twenty (20) days.

Should you have any questions regarding these Interrogatories, please contact me at (717) 237-4868.

Very truly yours,



Tanya C. Leshko

TCL/ja

Enclosure

cc: Rosemary Chiavetta, Secretary (*Letter and Certificate of Service only via eFiling*)
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Blackhorse Empire, LLC to	:	
transport, as a common carrier, by motor	:	
vehicle, persons in paratransit service,	:	Docket No. A-2024-3050285
between points in the Counties of Berks,	:	
Bucks, Chester, Delaware, Huntingdon,	:	
Montgomery and Susquehanna, and the City	:	
and County of Philadelphia.	:	

**INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
PROPOUNDED BY JOINT PROTESTANTS ON
BLACKHORSE EMPIRE, LLC – SET I**

Pursuant to Section 333(d) of the Public Utility Code, 66 Pa.C.S. § 333(d), and 52 Pa. Code §§ 5.341 *et seq.*, 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”) propound the following Interrogatories and Requests for Production of Documents (collectively, “Data Requests”) on Blackhorse Empire, LLC (“Applicant,” or “Responding Party”) – Set I. The Interrogatories are to be fully answered separately, after restating the question, in writing, and verified, WITHIN 20 DAYS of service hereof, pursuant to 52 Pa. Code § 5.342(a), (d).

These interrogatories are continuing, and any information secured or discovered subsequent to the filing of your answers is to be supplied by supplemental answers.

INSTRUCTIONS AND DEFINITIONS

1. “Responding Party,” “Applicant,” “you,” or “your” means the party to which these Data Requests are propounded and/or all agents, affiliates, employees, consultants, and representatives acting on behalf of the Responding Party.

2. “Commission” or “PUC” means the Pennsylvania Public Utility Commission.

3. To “identify” a natural person means to state that person’s full name, title or position, employer, last known address, and last known telephone number.

4. To “identify” a business entity means to state the full name of such business, the form of the business, and its location or address.

5. To “identify” a “document” means to provide all of the following information irrespective of whether the document is deemed privileged or subject to any claim of privilege:

- a. The title or other means of identifying and distinguishing each such document;
- b. The date of each such document;
- c. The author, preparer or signer of each such document; and
- d. A description of the subject matter of such document sufficient to permit an understanding of its contents and importance to the testimony or position being examined and the present or last known location of the document. The specific nature of the document should also be stated (*e.g.*, letter, business record, memorandum, computer print-out, etc.).

In lieu of “identifying” any document, it shall be deemed a sufficient compliance with these Data Requests to attach a copy of each such document to the answers hereto and reference said document to the particular Data Request to which the document is responsive.

6. “Document” means all writings of any kind including the originals of all non-identical copies, whether different from the originals by reason of any notation made on such copies or otherwise (including without limitation), all written and graphic matter, however

produced or reproduced, of any kind or description, whether or not sent or received, and all copies thereof which are different in any way from the original (whether by interlineation, date-stamp, notarization, indication of copies sent or received, or otherwise), including without limitation, any emails, paper, book, account, photograph, blueprint, drawing, sketch, schematic, agreement, contract, memorandum, press release, circular, advertising material, correspondence, letter, telegram, telex, object, report, opinion, investigation, record, transcript, hearing, meeting, study, notations of any sort, working paper, summary, intra-office communication, diary, chart, minutes, index sheet, computer software, computer-generated records or files, however stored, check, check stub, delivery ticket, bill of lading, invoice, record or recording or summary of any telephone or other conversation, or of any interview or of any conference, or any other written, recorded, transcribed, punched, taped, filmed, or graphic matter of which the Responding Party has or has had possession, custody or control, or of which the Responding Party has knowledge.

7. The term “all documents” means every document as above defined known to you and every such document that can be located or discovered by reasonably diligent efforts.

8. To “identify” an oral communication means to state the date, place or places, and parties to the oral communication or some other means of identifying the oral communication; set forth the substance thereof,

9. The phrase “within the scope of this application” refers to the authority as sought in the application to the Pennsylvania Public Utility Commission as shown in the Pennsylvania Bulletin published in this proceeding.

10. “Communication” means any manner or form of information or message transmission, however produced or reproduced, whether as a document as herein defined, or orally

or otherwise, which is made, distributed, or circulated between or among persons, or data storage or processing units.

11. “Date” means the exact day, month, and year, if ascertainable, or if not, the best approximation thereof.

12. “Person” or “Persons” means all individuals and entities, including without limitation: individuals, representative persons, associations, companies, corporations, partnerships, limited partnerships, joint ventures, trusts, estates, public agencies, departments, divisions, bureaus, and boards.

13. “Affiliation” means wherein the Responding Party owns any stock in another entity holding transportation authority from the Commission, holds an office in another entity holding transportation authority from the Commission, holds a position of management in another entity holding transportation authority from the Commission, or has a financial interest in another entity holding transportation authority from the Commission.

14. Items referred to in the singular include those in the plural, and items referred to in the plural include those in the singular.

15. Items referred to in the masculine include those in the feminine, and items referred to in the feminine include those in the masculine.

16. The answers provided should first restate the question asked and identify the person(s) supplying the information.

17. In answering these interrogatories, the Responding Party is requested to furnish all information that is available to the Responding Party, including information in the possession of the Responding Party’s attorneys, agents, consultants, or investigators, and not merely such information of the Responding Party’s own knowledge. If any of the interrogatories cannot be

answered in full after exercising due diligence to secure the requested information, please so state and answer to the extent possible, specifying the Responding Party's inability to answer the remainder, and stating whatever information the Responding Party has concerning the unanswered portions. If the Responding Party's answer is qualified in any particular, please set forth the details of such qualification.

18. If the Responding Party objects to providing any document requested on any ground, identify such document by describing it as set forth in Instruction 5 and state the basis of the objection.

19. If the Responding Party objects to part of an interrogatory and refuses to answer that part, state the Responding Party's objection and answer the remaining portion of that interrogatory. If the Responding Party objects to the scope or time period of an interrogatory and refuses to answer for that scope or time period, state the Responding Party's objection and answer the interrogatory for the scope or time period that the Responding Party believes is appropriate.

20. If, in connection with an interrogatory, the Responding Party contends that any information, otherwise subject to discovery, is covered by either the attorney-client privilege, the attorney work product doctrine or any other privilege or doctrine, then specify the general subject matter of the information and the basis to support each such objection.

21. If any information is withheld on grounds of privilege or other protection from disclosure, provide the following information: (a) every person to whom such information has been communicated and from whom such information was learned; (b) the nature and subject matter of the information; and, (c) the basis on which the privilege or other protection from disclosure is claimed.

Interrogatories and Requests for Production of Documents
Propounded by Protestants on
Blackhorse Empire, LLC – Set I

1. Identify the owner(s), officers(s), director(s) and/or shareholder(s) of Blackhorse Empire, LLC. For each, provide the following.
 - (a) Percentage of ownership interest;
 - (b) Position(s) held.

2. Since January 1, 2005, has any officer, director, shareholder or driver of Applicant been convicted of a felony or crime of moral turpitude? If so describe:
 - (a) the nature of the felony or crime;
 - (b) the date of sentencing and the sentence imposed.

3. Is any officer, director, shareholder or driver of Applicant subject to supervision by a court or correctional institution? If your answer is affirmative, please provide all details of the supervision.

4. What experience do you have in the business of transportation of passengers by motor vehicle?

5. Does the Applicant intend to serve elderly, medically fragile or disabled individuals? What experience does Applicant have that will enable them to provide such service safely?

6. Does/do the owner(s), officer(s), director(s) and/or shareholder(s) of Applicant currently possess any affiliation or interest, financial or otherwise, and/or been involved in the operations of any other entity, wherever located, which transported passengers for compensation? If so, please provide:
 - (a) the name and address of the entity;

- (b) the principal business of the entity (i.e., taxicab, limousine, paratransit, etc.);
 - (c) a description of the service territory of the entity;
 - (d) the name of each individual who possesses an interest or is involved in the entity, as well as the nature and extent of the interest and the duties of that individual; and
 - (e) all orders, certificates, or other evidence of approval from any governmental agency.
7. What type of transportation, if any, does Applicant currently render in:
- (a) interstate commerce (give percentage of total transportation revenue)?
 - (b) Pennsylvania intrastate commerce (give percentage of total transportation revenue)?
8. Has Applicant transported within the past three (3) years passengers in Pennsylvania intrastate transportation, either directly or indirectly? If so, please explain and identify the type of service provided.
9. Identify all specific locations from which the Applicant renders or intends to render intrastate transportation service.
10. Identify and attach copies of the authority and/or tariffs for paratransit rights previously requested from, or granted to, Applicant or any affiliated entity by the Pennsylvania Public Utility Commission, if any.

11. Has the Applicant or any of its officers, shareholders or directors ever been the subject of any complaint to the Pennsylvania Public Utility Commission, the Federal Motor Carrier Safety Administration or any other state or federal regulatory or governmental agency? If so, please state,
 - (a) when the complaint occurred;
 - (b) the identity of the complainant;
 - (c) the nature of the complaint;
 - (d) the final disposition of the complaint; and
 - (e) produce copies of the complaint and any final order or settlement resolving the complaint.
12. Provide copies of any agreements, contracts, leases and/or licensing agreements Applicant has or has had with any other transportation provider or supplier.
13. Describe any business in which Applicant and each of its officers, shareholders and directors is engaged, other than the paratransit business.
14. Have any officers, shareholders or directors of Applicant ever possessed any affiliation or interest in a business which went into bankruptcy? If so, please provide the name and location of the business, court, date of filing, and bankruptcy docket number.
15. Has Applicant or any of its officers, shareholders or directors ever been the subject of a complaint or lawsuit by any governmental entity or agency? If so, please provide details including subject matter, court, and docket number.
16. Identify by name and address the accountant of Applicant and any other persons responsible for auditing and/or maintaining the financial records of Applicant.

17. Identify all persons who are employed by Applicant and who are expected to testify on behalf of Applicant, and give a summary of his/her expected testimony.
18. Identify all persons who are expected to testify on behalf of Applicant and give a summary of their expected testimony as well as the name and address of any organization they are representing.
19. For all vehicles the Applicant intends to use in the business identify with respect to each:
 - (a) the year, make, model and mileage;
 - (b) the price and the date when the vehicle was acquired by Applicant;
 - (c) the identity of the lessor for each vehicle, if any, and, if applicable, the date, duration and method of financing of the lease;
 - (d) the seating capacity;
 - (e) the license plate number and vehicle identification number; and
 - (f) the air-conditioning, wheelchair capability, and any other features specifically intended to accommodate customers with physical disabilities.
 - (g) how the Applicant has control of the vehicle (e.g. owns, leases etc.).
20. With respect to each of the vehicles you identified in your answer to Interrogatory # 18 above, describe any special equipment intended to enhance safety or accommodate physically fragile individuals that is not standard to the vehicle, e.g., wheelchair lifts, life support systems, medical emergency systems, emergency lighting equipment installed or to be installed.

21. Identify any vehicles Applicant proposes to acquire if the application for certificate of authority is granted, and state the following:
 - (a) the year, make and model;
 - (b) the price and the date when the vehicle will be acquired by Applicant;
 - (c) the identity of the lessor for each vehicle, if any, and, if applicable, the date, duration and method of financing of the lease;
 - (d) the seating capacity;
 - (e) the vehicle identification number; and
 - (f) the air-conditioning, wheelchair capability, and any other special safety or accommodative features.
22. Please describe the method to be utilized to dispatch vehicles.
23. Describe each office, garage or other location owned or operated by Applicant, as well as each proposed office, garage or other location, and describe the vehicle maintenance, dispatch office and other facilities at each.
24. Have any vehicles intended to be used in Applicant's paratransit service been involved in a reportable accident any at time? If so, provide the details as to each such accident.
25. Describe any special qualifications, training or licenses that will be required of drivers providing the proposed service, including, but not limited to medical certifications.

26. Please describe the programs and standards the Applicant will use for inspections and maintenance of the vehicles it will use in paratransit service.
27. Explain how Applicant will ensure that a driver's license has not been revoked while they are employed by the Applicant.
28. Has Applicant, or any of its drivers, agents, servants, employees, or independent contractors, been convicted of a violation of the Motor Vehicle Code of any state while operating a vehicle, between January 1, 2009 and the date of the responses to these Interrogatories? If so, provide the details of each such violation, including date, case number, offense, and fine or other disposition of the case.
29. Identify each employee employed by Applicant as of the time of your response hereto, including his or her job titles (i.e., drivers, maintenance, dispatch, etc.).
30. Identify the independent contractors or other non-employees who perform services for Applicant, the nature of their job(s) and how often on average each works or will work for Applicant.
31. Please explain how the vehicles, drivers, employees and equipment the Applicant plans to use are sufficient to serve the territory for which paratransit certification is being sought.
32. Identify any written or oral contracts or understandings, and produce copies of any written contract or understanding, Applicant has to provide transportation service or related service to or from the below-listed entities originating at points in the Counties of Bucks, Chester and Montgomery. If said contracts or understandings are oral in nature, describe the agreement, including, but not limited to, the duration of the agreement, the fees to be paid, and the nature of the transportation services provided.
 - (a) hospitals;

- (b) other healthcare institutions (including nursing homes and adult “daycare” facilities);
- (c) any private organization;
- (d) any agency of the Commonwealth of Pennsylvania; and
- (e) any non-profit or public organization.

33. Furnish Joint Protestants with:

- (a) your latest balance sheet and profit and loss statement;
- (b) the present application you filed with the Pennsylvania Public Utility Commission;
- (c) any other papers filed by you with the Pennsylvania Public Utility Commission;
- (d) a rate schedule or description of the money charges you intend to impose for the transportation services you intend to perform;
- (e) any and all documents that set forth safety procedures to be used by Applicant;
- (f) a description of any existing or proposed maintenance policies;
- (g) a description of any subsidy by a government agency (federal, state or local) which you expect to receive for your transportation and the amount of such existing or expected subsidy; and

- (h) a copy of Applicant's Bylaws, Limited Liability Company Agreement and/or Operating Agreement.
34. Furnish copies of all advertising published, distributed, circulated or performed by Applicant including, but not limited to, brochures; yellow pages; newspapers; flyers; web pages; Facebook, Twitter and other social media sites and their content; and direct mail.
35. (a) Do you intend to utilize the first full day of hearing assigned?
- (b) Do you intend to utilize more than the first full day of hearing assigned?
- (c) Identify each witness not previously identified in Responses to Interrogatory # 14 and Interrogatory # 15 you expect to call at the hearing of this matter.
36. Has the Applicant, or any individual associated with Applicant (whether by employment, ownership, or otherwise), either directly or indirectly, sought operating rights from the Pennsylvania Public Utility Commission within the past three (3) years? If so, identify the name of the applicant, PUC docket number, and disposition or current status of such application.
37. State whether, at any time since January 1, 2009, Applicant has received a notice of cancellation or revocation concerning any insurance policy of Applicant. If so, describe the notice and/or circumstances surrounding any revocation.
38. Please identify the service area currently served under any existing Certificate of Public Convenience. Please identify the following:
- (a) Average number of trips per week;
 - (b) Vehicles utilized for service;
 - (c) Type(s) of service provided;
 - (d) Drivers utilized to provide service.
39. Please describe in detail all studies, analyses, projections and/or forecasts Applicant has prepared or had prepared on its behalf with respect to expected traffic, revenues, expenses

and profit to be generated in the future by the proposed service in the area covered by this application. Provide copies of all such studies, analyses, projections and/or forecasts.

40. Has the Applicant ever had a certificate of operating authority suspended or revoked by the Pennsylvania Public Utility Commission? If so, please state:
 - (a) when the suspension or revocation occurred;
 - (b) the reason for the suspension or revocation;
 - (c) the final disposition of the suspension or revocation; and
 - (d) produce copies of the suspension or revocation notice and any final order or settlement resolving the suspension or revocation.

41. Has the Applicant ever rendered paratransit service in a territory for which it did not hold a certificate of paratransit operating authority? If so, please state:
 - (a) the date, time and place of such authorized or unauthorized service, including the place or origin and place of ending the trip;
 - (b) the identity of the rider;
 - (c) produce copies of the log books which reflect such authorized and/or unauthorized service; and
 - (d) specify the amount of compensation paid for the service rendered.

42. Provide a copy of each document Applicant proposes to introduce as an exhibit in the hearing of this case.

43. Identify by name, title, and address all persons who have provided information used in answering the foregoing interrogatories and identify, for each person involved, the specific interrogatory, or interrogatories, for which they supplied information.

DATED: October 22, 2024

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Blackhorse Empire, LLC to :
transport, as a common carrier, by motor :
vehicle, persons in paratransit service, : Docket No. A-2024-3050285
between points in the Counties of Berks, :
Bucks, Chester, Delaware, Huntingdon, :
Montgomery and Susquehanna, 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 and Regular Mail:

Sylvester Thomas
238 North 12th Street
Reading, PA 196047
blackhorseempirellc@gmail.com

Date: October 22, 2024



Tanya C. Leshko

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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transport, as a common carrier, by motor :
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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.

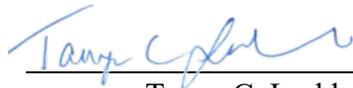
Administrative Law Judge Eranda Vero
evero@pa.gov

Via Email

Sylvester Thomas
238 North 12th Street
Reading, PA 196047
blackhorseempirellc@gmail.com

Via Email and Regular Mail

Date: November 14, 2024



Tanya C. Leshko