

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN RE; APPLICATION OF
EXECUDRIVER, LLC

Docket No. A-2025-3054379

PROTEST OF GILBRIDE LIMOUSINE INC.

Comes now, Protestant, Gilbride Limousine, Inc., with address and place of business as 1015 Underwood Road, Olyphant, Pennsylvania 18447, by and through its attorney, and in accordance with the Rules of Practice of the Commission, submits this, its Protest, to the above captioned Application, for a certificate of public convenience, and states the basis of which is as follows:

1. Applicant's name and Application docket number are Execudriver, LLC, 223 Morgan Manor Drive, Scranton, Pennsylvania 18508; Docket Number A-2025-3054379.
2. Protestant's business name, address and telephone are: Gilbride Limousine, Inc., 1015 Underwood Road, Olyphant, Pennsylvania 18447; telephone (570) 840-5221.
3. Protestant's attorney's name, address and telephone is: Joseph R. D'Andrea, Esquire, 320 North Blakely Street, Dunmore, Pennsylvania 18512; telephone (570) 207-7100.
4. The name and address of Applicant's attorney is presently unknown.
5. The nature of Protestant's interests in the Application and statement of adverse impact is as follows:

(A) The nature of Protestant's interests is the scope of authority sought in the application, with respect to Lackawanna County.

Applicant seeks to transport persons, in limousine service, between points in Pennsylvania, excluding service that is under the jurisdiction of the Philadelphia Parking Authority.

Protestant presently holds operating authority from this Commission under Certificate of Public Convenience issued in No. A-00111294, to transport as a common carrier, by motor vehicle, persons, in limousine service, between points in Pennsylvania.

(B) The adverse impact of the Application is that a grant of the Application will jeopardize the safety and convenience of the public

(C) Further, Protestant challenges the Applicant's fitness to perform the proposed service due to (1) Applicant's failure to demonstrate that it has sufficient capital, equipment, facilities and other resources necessary to safely and lawfully serve the requested territory; (2) Applicant's failure to demonstrate it and its employees have sufficient technical expertise and experience to serve the requested territory; (3) Applicant's failure to demonstrate its ability to secure adequate and continuous insurance coverage (as set forth in the Commission's Tentative Order of May 18, 2023 at Docket No. M-2023-2040248); and (4) Applicant's failure to demonstrate it has appropriate plans or policies required to comply with Commission orders or regulations, the Commission's driver and vehicle safety

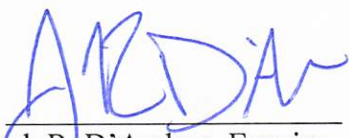
regulations and service standards, and Commission regulations regarding driver criminal and moral turpitude convictions history (as set forth in the Commission's Complaint proceeding dated November 24, 2020, at Docket C-2020-3022451, and Complaint proceeding dated June 17, 2015, at Docket No. C-2015-2488074).

6. The Commission's docket numbers under which Protestant operates its authorized limousine service is Certificate No. A-00111294, (an abstract of which is attached hereto as Exhibit A)

7. Pursuant to 66 Pa. C.S. Section §333(c), demand is hereby made upon Applicant to provide Protestant's attorney with a list identifying the names, addresses, and group or company affiliation of any or all witnesses expected to testify in support of this Application proceeding, together with the subject matter of their expected testimony and any supporting documents.

WHEREFORE, the above premises be considered, Protestant respectfully prays this Application be dismissed and denied.

Dated: 6 June 2025

By: 
Joseph R. D'Andrea, Esquire
Attorney for Protestant
320 North Blakely
Dunmore, PA 18512
Phone: 570-207-7100
PA Attorney ID: 43105

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document. Protest of Gilbride Limousine, Inc., upon the parties listed below, in accordance with the requirements of 52 Pa. Code Section §1.54 (relating to service by a party).

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
(Via eFiling)

Execudriver LLC
223 Morgan Manor Drive
Scranton, PA 18508
(Via First Class Mail, Postage Prepaid)

Dated: 6 June 2025


By: 
Joseph R. D'Andrea, Esquire
Attorney for Protestant
320 North Blakely
Dunmore, PA 18512
Phone: 570-207-7100
PA Attorney ID: 43105

EXHIBIT A

Certificate No. A-00111294

GILBRIDE LIMOUSINE, INC.

To transport as a common carrier, by motor vehicle, persons, in limousine service,
between points in Pennsylvania.