

September 4, 2015

**Via Electronic Filing**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
P.O. Box 3265  
Harrisburg, PA 17105-3265

In re: Docket No. A-2015-2475776  
Application of Amigo Cab, LLC

Dear Secretary Chiavetta:

We are counsel to Protestant Autocab, Inc. in the above matter and are submitting via electronic filing with this letter its Motion for A General Continuance of this proceeding. A copy of the Motion is being served upon the persons and in the manner set forth on the certificate of service attached to it.

Very truly yours,

THOMAS, NIESEN & THOMAS, LLC

By 

Thomas T. Niesen

Enclosure

cc: Certificate of Service (w/encl.)  
Timothy J. Schwartz (via email, w/encl.)

150904-Chiavetta (Motion for Continuance).wpd

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Administrative Law Judge Dennis J. Buckley, Presiding

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Application of Amigo Cab, LLC for : Docket No. A-2015-2475776  
Approval to Provide Taxi Service Between :  
Points in the Counties of Berks and :  
Lancaster to Points in Pennsylvania and :  
return :

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**NOTICE TO PLEAD**

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TO: AMIGO CAB, LLC

BE ADVISED that, pursuant to 52 Pa. Code § 5.103(b), an answer to the following Motion of Protestant Autocab, Inc. for General Continuance must be filed with the Public Utility Commission within 20 dates of the date of service of the Motion. The date of service is September 4, 2015.



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By: Thomas T. Niesen, Esquire  
PA Attorney ID No. 31379  
THOMAS, NIESEN & THOMAS, LLC  
212 Locust Street, Suite 600  
Harrisburg, PA 17101

*Attorney for Protestant Autocab, Inc.*

DATE OF SERVICE: September 4, 2015

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Administrative Law Judge Dennis J. Buckley, Presiding

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Application of Amigo Cab, LLC for : Docket No. A-2015-2475776  
Approval to Provide Taxi Service Between :  
Points in the Counties of Berks and :  
Lancaster to Points in Pennsylvania and :  
return :

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**MOTION OF PROTESTANT AUTOCAB, INC. FOR GENERAL CONTINUANCE**

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AND NOW, comes Autocab, Inc., (“Protestant Autocab”), by its attorneys, and, pursuant to 52 Pa. Code § 5.103, moves for a general continuance of this application proceeding pending resolution of the Application of Express Taxi, LLC at Docket No. A-2015-2475767. In support of its Motion, Protestant Autocab submits as follows:

**BACKGROUND**

1. This proceeding concerns the Application of Amigo Cab, LLC, filed with the Public Utility Commission (“Commission”) on or about March 16, 2015, to provide call or demand service in Berks and Lancaster Counties.
2. Protestant Autocab provides call or demand service in Lancaster County and filed a timely Protest to the Application on June 3, 2015.
3. By Hearing Notice dated July 9, 2015, an initial hearing was scheduled for September 9, 2015, with Administrative Law Judge Buckley presiding.
4. Subsequently, by Prehearing Order dated August 31, 2015, Judge Buckley continued the September 9, 2015 initial hearing until a later date.

5. By Hearing Notice dated September 2, 2015, the initial hearing was rescheduled for October 14, 2015, with Judge Buckley presiding.

6. By this motion, Protestant Autocab moves that this application proceeding of Applicant Amigo Cab be continued generally until the conclusion of the pending Application of Express Taxi, LLC at Docket No. A-2015-2475767.

7. The Express Taxi proceeding is assigned to Administrative Law Judge Elizabeth H. Barnes. A formal evidentiary hearing was held on August 21, 2015, with Judge Barnes presiding. Main and reply briefs are due on October 5, 2015, and October 20, 2015, respectively.

8. Protestant Autocab is a Protestant and an active party in the Express Taxi proceeding at Docket No. A-2015-2475767.

**RELATIONSHIP BETWEEN APPLICANT AMIGO CAB AND EXPRESS TAXI, LLC**

9. The applications of Express Taxi, LLC and Applicant Amigo Cab seek authority to provide call or demand service in Berks and Lancaster Counties. Mr. Maher Saber Ahmed (a/k/a Mark Saber) is the principal person involved in each application.

10. Mr. Ahmed is the 100% owner of Express Taxi, LLC. Mr. Ahmed appeared and testified at the Express Taxi hearing on August 21.

11. Mr. Ahmed is the “manager” of Applicant Amigo Cab. In response to discovery served by Protestant in the Amigo Cab proceeding (a copy of which is attached to this motion as Exhibit 1), Mr. Ahmed is identified as “manager” and also as “administrative personnel.” Protestant’s discovery was, in fact, “Answered By” Mr. Ahmed as presented on the cover page of the answers. Mr. Ahmed, moreover, is the signatory to the Verification confirming the accuracy of Applicant Amigo Cab’s discovery responses.

12. Additionally, when asked in Interrogatory No. 16 to describe its experience in the taxicab industry, Applicant Amigo Cab repeated that it is managed by Mr. Ahmed and then stated that Mr. Ahmed owns Keystone Cab Service, Inc. and EZ Taxi, LLC; that Mr. Ahmed manages the day to day operations of United Cab, LLC, Good Cab, LLC, Amigo Taxi, LLC Diamond Taxi, LLC and Dollar Taxi, LLC; and that he has been in the taxicab industry since 2002 when he started Keystone Cab.

13. Although expressly asked to do so in Interrogatory No. 9, Applicant Amigo Cab declined to identify a single witness (including a single public need witness) that it intended to present at hearing. It is likely, nevertheless, that Applicant Amigo Cab will attempt to present Mr. Ahmed, either with or without the appearance of Mr. Saber Elnaggar, the purported 100% owner of Amigo Cab, at hearing in support of the application. Whether he appears or not there is nothing thus far that suggests that Mr. Elnaggar is actively involved in Applicant Amigo Cab. The enterprise seems to be entirely within the control of Mr. Ahmed.

#### **JUSTIFICATION FOR GENERAL CONTINUANCE**

14. The evidentiary criteria in 52 Pa. Code Section 41.14 provide that an applicant seeking motor common carrier authority has the burden to demonstrate that it possesses the technical and financial ability to provide the proposed service and that authority may be withheld if the record demonstrates that applicant lacks a propensity to operate safely and legally. Compliance with the Public Utility Code, Title 52 and Commission orders is one of the factors ordinarily considered by the Commission in evaluating an applicant's fitness.

15. Protestant Autocab contested the fitness and propensity to operate safely and legally of Express Taxi and Mr. Ahmed at the Express Taxi hearing on August 21 and will contest Express Taxi's fitness in brief. At hearing in Express Taxi, Protestant Autocab presented

23 cross examination exhibits of Commission complaints against Keystone Cab and EZ Taxi, affiliates of Express Taxi and Mr. Ahmed, as follows:

- a. Protestant's Cross Examination Exhibit P-2 – Bureau of Investigation and Enforcement v. Keystone Cab Service, Inc., C-2014-2437292
- b. Protestant's Cross Examination Exhibit P-3 – Bureau of Investigation and Enforcement v. Keystone Cab Service, Inc., C-2013-2365995
- c. Protestant's Cross Examination Exhibit P-4 – Bureau of Investigation and Enforcement v. Keystone Cab Service, Inc., C-2013-2346710
- d. Protestant's Cross Examination Exhibit P-5 – Bureau of Investigation and Enforcement v. Keystone Cab Service, Inc., C-2012-2277687
- e. Protestant's Cross Examination Exhibit P-6 – Bureau of Investigation and Enforcement v. Keystone Cab Service, Inc., C-2011-2255901
- f. Protestant's Cross Examination Exhibit P-7 – Bureau of Investigation and Enforcement v. Keystone Cab Service, Inc., C-2010-2206518
- g. Protestant's Cross Examination Exhibit P-8 – Bureau of Transportation and Safety v. Keystone Cab Service, Inc., C-2010-2186452
- h. Protestant's Cross Examination Exhibit P-9 – Bureau of Transportation and Safety v. Keystone Cab Service, Inc., C-2010-2140064
- i. Protestant's Cross Examination Exhibit P-10 – Bureau of Transportation and Safety v. Keystone Cab Service, Inc., C-2009-2104523
- j. Protestant's Cross Examination Exhibit P-11 – Bureau of Transportation and Safety v. Keystone Cab Service, Inc., C-2009-2104522
- k. Protestant's Cross Examination Exhibit P-12 – Vicki Piontek v. Keystone Cab Service, Inc., C-2008-2023628
- l. Protestant's Cross Examination Exhibit P-13 – Bureau of Transportation and Safety v. Keystone Cab Service, Inc., A-0011855C0701
- m. Protestant's Cross Examination Exhibit P-14 – Pa. P.U.C. v. Keystone Cab Service, Inc., A-0011855C0503
- n. Protestant's Cross Examination Exhibit P-15 – Pa. P.U.C. v. Keystone Cab Service, Inc., A-0011855C0403

- o. Protestant's Cross Examination Exhibit P-16 – Bureau of Transportation and Safety v. Keystone Cab Service, Inc., A-0011855C0304
- p. Protestant's Cross Examination Exhibit P-17 – Bureau of Transportation and Safety v. Keystone Cab Service, Inc., A-0011855C0301
- q. Protestant's Cross Examination Exhibit P-18 – Bureau of Transportation and Safety v. Keystone Cab Service, Inc., A-0011855C0503, Opinion and Order entered February 9, 2006
- r. Protestant's Cross Examination Exhibit P-19 – Bureau of Technical Utility Services v. Keystone Cab Service, Inc., M-2012-2340824
- s. Protestant's Cross Examination Exhibit P-20 – Bureau of Investigation and Enforcement v. EZ Taxi, LLC, C-2014-2436042
- t. Protestant's Cross Examination Exhibit P-21 – Bureau of Investigation and Enforcement v. EZ Taxi, LLC, C-2013-2365871
- u. Protestant's Cross Examination Exhibit P-22 – Bureau of Investigation and Enforcement v. EZ Taxi, LLC, C-2013-2364204
- v. Protestant's Cross Examination Exhibit P-23 – Bureau of Investigation and Enforcement v. EZ Taxi, LLC, C-2013-2345812
- w. Protestant's Cross Examination Exhibit P-24 – Bureau of Investigation and Enforcement v. EZ Taxi, LLC, C-2010-2213152

16. Although Express Taxi objected to the admission of the foregoing cross examination exhibits claiming that the complaints and violations did not involve Express Taxi, the corporate applicant, Judge Barnes denied the objection. Protestant Autocab believes that the evidence of complaints and violations was properly accepted into evidence and submits that the complaints and violation must be considered in weighing the fitness and propensity to operate safely and legally of Mr. Ahmed and his new and related companies to open new operations, including the fitness and propensity of Applicant Amigo Cab and its manager Mr. Ahmed to initiate a new service in Lancaster County.

17. In both Express Taxi and here, Applicants have cited Mr. Ahmed's experience in the taxicab industry in support of their application. Having made that assertion, the actual details of Mr. Ahmed's experience in the taxicab industry with Keystone Cab, EZ Taxi and all of the other taxicab entities with which Mr. Ahmed is involved is relevant to the fitness determination in Express Taxi and Amigo Cab and whether either Applicant – Express Taxi or Amigo Cab – is fit and has a propensity to operate safely and legally. Mr. Ahmed's fitness and the multitude of regulatory proceedings in which his other companies have been involved, in other words, are relevant matters and common issues in both Application proceedings.

### **CONCLUSION**

18. With a record already having been created in Express Taxi and the issues of fitness and propensity to operate safely and legally moving to briefing, Protestant Autocab submits that a general continuance of this proceeding pending conclusion of that proceeding would conserve the time and effort of the parties and the Commission. Although the corporate applicants differ in name, Mr. Ahmed, for all intents and purposes, is the individual in control of each of the applicants. Autocab, Inc. is the Protestant in both proceedings. If the Commission were to conclude that Express Taxi is not fit to initiate service and/or has a propensity to operate in an unsafe and/or illegal manner given the multitude of regulatory complaints and violations of Keystone Taxi and EZ Cab then that same rationale would apply to the Application of Amigo Cab, which is to be managed by Mr. Ahmed. At the conclusion of the Express Taxi proceeding a determination of the issues remaining for resolution in this Amigo Cab proceeding could be addressed.



WHEREFORE, for the reasons set forth above, Protestant Autocab, Inc. moves for a general continuance of the Application of Amigo Cab, LLC at Docket No. A-2015-2475776.

Respectfully submitted,



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By: Thomas T. Niesen, Esquire  
PA Attorney ID No. 31379  
THOMAS, NIESEN & THOMAS, LLC  
212 Locust Street, Suite 600  
Harrisburg, PA 17101

*Attorney for Protestant Autocab, Inc.*

DATE: September 4, 2015

# EXHIBIT 1

BEFORE THE  
PENNSYLVANIA UTILITY COMMISSION

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IN THE MATTER OF:  
APPLICATION OF AMIGO CAB, LLC  
NUMBER A-2015-2475776

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APPLICANTS RESPONSE

TO

INTERROGATORIES AND  
REQUESTS FOR THE PRODUCTION OF DOCUMENTS OF  
PROTESTANT AUTOCAB, INC.

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Dated: July 13, 2015

Answered by: Maher Saber Ahmed  
620 South 13th Street  
Harrisburg, PA 17104

## INTERROGATORIES AND DOCUMENT REQUESTS

1. Identify the owners of Applicant:
  - (a) If a corporation or other business entity, by name, address and percentage of stock or interest held.
    1. See application
  - (b) By position of employment with Applicant.
    1. See application
  - (c) By position of employment with an employer other than Applicant.
    1. See application
2. Identify by name, duties, address and telephone number the administrative personnel of Applicant in respect to their daily operations.
  2. Maher S. Ahmed 620 S. 13th Street Harrisburg, PA 17104 (717) 773-5452
3. Set forth the list of all taxicab vehicles the Applicant now owns or leases. Include the make, year, body style, license plate number, vehicle identification number and date purchased or leased.
  3. At this time the applicant owns zero taxicabs. However, upon approval of Amigo Cab's application for call or demand authority applicant intends to purchase no less than two vehicles meeting the following characteristics: a) Model Year 2007 or newer; b) Domestic; c) Capable of transporting no less than 5 passengers including the driver
4. Furnish copy of insurance policy on each vehicle.
  4. At this time applicant does not own any taxicabs and thus has no vehicles to presently insure. However, applicant, through its manager (Mr. Ahmed), has existing relationships with several livery insurers that would issue policies as soon as vehicles are obtained.
5. Identify by name, address and telephone number all drivers.
  5. At this time applicant do not have any drivers

6. Furnish copies of each driver's qualification file.

6. N/A

7. List all requests for service that will be offered in support of the Application, include:

(a) the date of each request;

7. Applicant objects to this interrogatory on the grounds that request is unclear. However, to the extent applicant understands the question at issue, none.

(b) the name, address and phone number of the person or company requesting service;

7. Applicant objects to this interrogatory on the grounds that request is unclear. However, to the extent applicant understands the question at issue, none.

(c) the nature of the service requested on each occasion, including the origin and destination of the requested transportation;

7. Applicant objects to this interrogatory on the grounds that request is unclear. However, to the extent applicant understands the question at issue, none.

(d) the disposition of the request, that is, whether or not the applicant provided the service or, if not, whether the request was transferred to another carrier and, if there was a referral, to which carrier was the request referred.

7. Applicant objects to this interrogatory on the grounds that request is unclear. However, to the extent applicant understands the question at issue, none.

8. What consequence, if any, will follow if the proposed service is not made available?

8. Objection. This request is overbroad and unduly burdensome and unlikely to lead to admissible evidence. To the extent that an answer is required, applicant would not be able to provide service in the requested service area. Additional consequences may exist, and applicant reserves the right to supplement this response as additional information becomes available.

9. State the name, address and telephone number of each witness, including public need witnesses, Applicant expects to call at the hearing on this Application and a summary of the subject matter of their expected testimony.

9. None at this time. However, a witness list will be provided prior to any hearing in this matter. Applicant reserves the right to supplement this response.

10. Identify all persons who have been involved on behalf of Applicant in soliciting public witnesses to testify in support of this Application.

10. None at this time. Applicant reserves the right to supplement this response.

11. Describe in detail, and furnish copies, of all studies, analyses, projections and forecasts you have prepared or have prepared with respect to expected traffic, revenues and expenses to be generated in the future by your service should Application be granted.

11. None at this time. Applicant reserves the right to supplement this response.

12. State whether Applicant has been the subject of any Complaint to the Public Utility Commission, or to any other state or federal regulatory or governmental agency concerning the manner, quality or provision of any regulated service or activity conducted by Applicant. If so, describe in detail the identity of complainant, the date of the complaint, the substance of the complaint and the ultimate resolution of the complaint.

12. Applicant has not been the subject of any such complaints

13. Furnish a copy of the Application and all attachments thereto as well as any other correspondence or documents filed with the Public Utility Commission or any members of its Staff.

13. See enclosed

14. Provide current financial data including a balance sheet and income statement and proforma financial data (including proforma balance sheet and proforma income statement) reflecting the grant of Authority sought.

14. Unavailable at this time. Applicant reserves the right to supplement this response.

15. Furnish copies of any management agreements, vehicle leases, subcontracting agreements and/or licensing agreements applicant has or has had with any other carriers.

15. Unavailable at this time. Applicant reserves the right to supplement this response.

16. Describe in detail Applicant's experience in the taxicab industry; including companies worked for, position held, starting and finishing dates of employment, vehicles driven, management functions, and job responsibilities.

16. Not enough space, answered on separate page enclosed

17. Provide copies of all exhibits to be presented by Applicant at hearing in this matter.

17. None at this time. Applicant reserves the right to supplement this response.

18. Identify by street address, municipality and county all business locations of Applicant and describe what facilities Applicant has at each location.

18. At this time applicant is located at 620 S. 13th Street Harrisburg, PA. However, applicant has no present operations beyond processing this application. Once the application is approved, applicant will obtain a facility in Reading, Berks County and Lancaster, Lancaster county for the purposes of providing call or demand service pursuant to this application

19. Provide copies of all responses provided by Applicant to Interrogatories of other Protestants.

19. See enclosed.

AS TO INTERROGATORIES  
AND DOCUMENT REQUESTS

Thomas, Niesen & Thomas, LLC  
212 Locust Street  
Suite 600  
Harrisburg, PA 17101

By

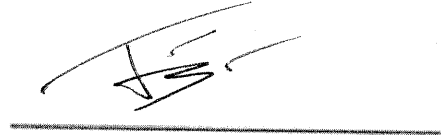


Thomas T. Niesen  
PA Attorney ID No. 31379

AS TO ANSWERS AND  
PRODUCTION OF DOCUMENTS

Amigo Cab, LLC

By



Autocab Interrogatories and Request for Documents to Amigo Cab.wpd



16. Applicant Amigo Cab, LLC is owned by Saber Elnaggar. Mr. Elnaggar also owns United Cab, LLC PA PUC No. A-6412947. Mr. Elnaggar has owned and operated United Cab since December of 2012 in Harrisburg, PA.

Additionally, Applicant is managed by Maher S. Ahmed. Mr. Ahmed owns Keystone Cab Service, Inc. PA PUC No. A-00118552 and EZ Taxi, LLC PA PUC No. A-00119741.

Additionally he manages the day to day operations of the following certificated carriers:

United Cab, LLC PA PUC No. A-006412947

Good Cab, LLC PA PUC No. A-00120846

Amigo Taxi, LLC PA PUC No. A-00122492

Diamond Taxi, LLC PA PUC No. A-00639925

Dollar Taxi, LLC PA PUC No. A-00639927

Mr. Ahmed has been in the taxicab industry since 2002. He started Keystone Cab as a single vehicle operation, and since that time has added multiple vehicles, opened a garage facility that services seven certificated entities, added a 24/7 dispatch facility, and was invited by the PUC to speak at its recent Transportation hearings. He has experience are all aspects of operating a call or demand service.

VERIFICATION

I, Maher S. Ahmed, hereby verify that the statements made in the foregoing ***Responses to Interrogatories and requests for production of documents*** are true and correct to the best of my knowledge, information and belief. I understand that the statements in the foregoing document are made subject to the penalties of 18 Pa.C.S. §4909 relating to unsworn falsification to authorities.

7/15/15

\_\_\_\_\_  
Date



\_\_\_\_\_  
Maher S. Ahmed

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2015 MAR 16 PM 4:08  
PA PUC BUREAU  
SECRETARY'S OFFICE

## Application for Motor Common Carrier of Persons upon Call or Demand (Taxi Service)

THIS APPLICATION IS TO BE USED FOR COMMON CARRIER PASSENGER SERVICE PROVIDING LOCAL TRANSPORTATION ON EITHER EXCLUSIVE OR NONEXCLUSIVE BASIS, AND SERVICE IS CHARACTERIZED BY PASSENGERS HIRING THE VEHICLE AND ITS DRIVER EITHER BY TELEPHONE CALL OR BY HAIL, OR BOTH. THIS APPLICATION CANNOT BE USED TO APPLY FOR TAXI SERVICE WITHIN THE CITY AND COUNTY OF PHILADELPHIA.

1. **Legal Name of Applicant** (Individual, Partnership or Corporation)

Amigo Cab, LLC

- If you are an individual who has not formed any type of corporate entity, you should enter your name **as it will appear on your insurance documents**.
- If you are filing for a partnership, but **not a limited liability partnership**, the names of all partners must be entered on this line. Those names should be entered **as they will appear on your insurance documents**. This includes husbands and wives filing jointly.
- If you are filing for a corporate entity (corporation, limited liability company, or limited liability partnership), **even if you are the sole shareholder member**, you must enter the name **exactly as it appears on the registration papers from the Corporation Bureau of the Pennsylvania Department of State**.

2. **Trade Name** (Attach a copy of fictitious name registration if applicable)

\_\_\_\_\_

This is any name which you will be operating under which differs from the **LEGAL NAME OF APPLICANT**. A **TRADE NAME** is considered a **FICTITIOUS NAME** if the identity of the applicant cannot be readily determined. *EXAMPLE: John Doe is the applicant and wants to use the name "Johnboy Trucking" as his trade name. People cannot readily determine that John Doe is the actual operator; therefore, the name is fictitious and must be registered as such. Trade names such as "John Doe Trucking" or "J. Doe Trucking" are not considered fictitious and would not have to be registered.*

3. **Do you currently hold PUC Authority?** \_\_\_NO **Previous Authority?** \_\_\_NO

If YES, at PUC No. A- 2012-2176038

4. **Are you a business entity registered with the PA Dept. of State?** \_\_\_NO

If NO, you must register (see checklist on how to register)

If YES, provide your PA Corporation Bureau Entity ID Number 4330829

(see checklist and indicate type of business entity registered)

5. **Physical Address** (do not use PO Box)

2304 Walnut Street

Street Address

Harrisburg, PA 17103

City, State and Zip Code

717-773-5452

Telephone Number

Dauphin

County

The address entered here should be the actual location of the business. This is the address the Commission needs in order to dispatch Enforcement Officers to inspect equipment.

6. **Mailing Address** (if different from Physical Address)

Street Address

City, State and Zip Code

This is the address to which the Commission will send all official documents issued by the Commission. If left blank, it will be assumed that the **MAILING ADDRESS** is the same as the **PHYSICAL ADDRESS**.

7. **Attorney** (if applicable)

Justine L. Pate, Esq. 347-351-2631

Attorney's Name & Telephone Number for this Filing

620 S 13<sup>th</sup> Street, Harrisburg, PA 17104

Attorney's Address

An attorney's name should only be entered if an attorney is filing the application for a client and the application is being sent under the attorney's cover letter.

8. **Does applicant hold interstate operating authority?**

No

Yes, at No. \_\_\_\_\_

9. **Describe the service area proposed by this application.**

(Use the space below or attach additional sheet if space provided is not sufficient).

To transport persons in call or demand service from points in the counties of Berks and Lancaster to points in Pennsylvania and return.

Examples:

- To transport people upon call or demand in the city of Reading, Berks County.
- To transport people upon call or demand in Spring Township, Centre County.

10.

**Certification:**

Applicant certifies that it is not now engaged in unauthorized intrastate transportation for compensation between points in Pennsylvania and will not engage in said transportation unless and until authorization is received from the Pennsylvania Public Utility Commission.

Applicant further certifies that it understands the requirements of the Pennsylvania Public Utility Commission, especially as they relate to safety and insurance and that it may be subject to civil penalties, suspension or cancellation of the Certificate for failure to comply with Commission requirements.

Applicant further certifies that it understands that it is subject to an annual assessment based upon its reported gross Pennsylvania intrastate revenues; said assessment to help defray expenses incurred in regulating Motor Common Carriers of Persons upon Call and Demand (Taxi Service); and acknowledges that failure to report revenue and pay its annual assessment may result in civil penalties, suspension or cancellation of the certificate.

**Verification of Application**

I/We hereby state that the statement(s) made in this application is/are true and correct to the best of my/our knowledge and belief.

The undersigned understands that false statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

\_\_\_\_\_  
 (Print Name) **SABER ELNAGGAR**

\_\_\_\_\_  
 (Signature) *S. ElNaggar*

3/16/15  
 (Date)

RECEIVED  
 2015 MAR 16 PM 4:00  
 PA PUC  
 SECRETARY'S BUREAU

The verification of the application must be completed by the applicant appearing on Line 1 of the application by the named individual, all partners if a partnership, a member (if a limited liability company), or by the President or Secretary (if a corporation).

Amigo Cab, LLC

Member: Saber Elnaggar, 2304 Walnut Street, Harrisburg, PA 17103, 100% Shares

Manager: Maher S. Ahmed, 2304 Walnut Street, Harrisburg, PA 17103, 717-773-5452

RECEIVED  
2015 MAR 16 PM 4:08  
PA PUC  
SECRETARY'S BUREAU

**INTERROGATORIES AND REQUESTS FOR THE  
PRODUCTION OF DOCUMENTS**

1. Provide the name, address and telephone number for each owner of the Applicant.
  1. See application
  
2. For each owner identified, provide his or her percentage of ownership in the Applicant.
  2. 100%
  
3. For each owner identified in request no. 1 above, provide his or her current occupation, and the name, address and telephone number of his or her current employer. How long has each owner worked for his or her current employer.
  3. Owner/Operator United Cab PUC No. A-6412947
  
4. If any of the owners are currently unemployed, provide the name, address and telephone number of that person's most recent employer, and provide the dates during which he or she worked for that employer. What was the person's occupation with that employer?
  4. N/A
  
5. Have any of the owners identified above ever been involved in the transportation business as an occupation? If so, for each such owner, fully describe the type of transportation business and the person's responsibilities in that business.
  5. Owner/Operator United Cab PUC No. A-6412947

6. Provide the address and a description of the facilities Applicant intends to use to provide the applied for service for each of the following functions:
  - a. storage of vehicles;
  - b. repair and maintenance of vehicles;
  - c. dispatch of vehicles from the time Applicant receives a call from a prospective customer; and
  - d. business office/administrative functions.
  
6. Unknown at this time. Applicant reserves the right to supplement this response.
  
7. How many vehicles does the Applicant intend to use initially to provide the applied for taxi service?
7. Upon approval of Express' application for call or demand authority applicant intends to purchase no less than two vehicles meeting the following characteristics:
  - a) Model Year 2007 or newer;
  - b) Domestic;
  - c) Capable of transporting no less than 5 passengers including the driver
  
8. Does the Applicant currently own any of the vehicles it intends to use to provide the applied for taxi service? If so, provide the year, make, model and mileage for each such vehicle.
  8. No.
  
9. Does the Applicant intend to purchase any vehicles in order to initially provide the applied for taxi service? If so, to the extent determined, provide the year, make and models of all such vehicles, as well as the estimated purchase price of each vehicle.
  
9. See answer to #7. Applicant reserves the right to supplement this response.
  
10. Has the Applicant investigated the cost of or obtained quotes for insurance necessary to meet the Pennsylvania Public Utility Commission's ("PA PUC") requirements for each vehicle to be used in the provision of taxi service? If so, identify the insurance companies contacted and provide annual the insurance cost estimates obtained for each vehicle.
  10. Objection. This request is overbroad and unduly burdensome and unlikely to lead to admissible evidence. To the extent a response is required, applicant has not obtained any quotes, however, applicant, through its manager (Mr. Ahmed), has existing relationships with several livery insurers that would issue policies as soon as vehicles are obtained.



11. Provide the rates that Applicant intends to charge for the proposed service if the application is granted.
11. Unknown at this time. Applicant reserves the right to supplement this response.
12. Describe all studies or analyses performed by the Applicant, if any, in determining the rates it intends to charge for the service proposed in this proceeding. Provide copies of any such studies or analyses.
12. None. Applicant reserves the right to supplement this response.
13. Provide the name, address, telephone number, occupation and relationship to Applicant of each witness Applicant intends to call at the hearing in this proceeding.
13. None at this time. However, a witness list will be provided prior to any hearing in this matter. Applicant reserves the right to supplement this response.
14. For each witness identified in response to request number 13 who will testify to prior usage of taxi service, if any, state, to the extent known, the carriers that provided the service, the dates of service, and the points of origin and destination.
14. None at this time. However, a witness list will be provided prior to any hearing in this matter. Applicant reserves the right to supplement this response.
15. For each witness identified in response to request number 13 who will testify as to expected future usage of Applicant's proposed taxi service, state the expected frequency of usage, and the expected points of origin and destination.
15. None at this time. However, a witness list will be provided prior to any hearing in this matter. Applicant reserves the right to supplement this response.
16. For each witness identified in response to request number 13, state the subject matter about which each will testify and summarize that testimony.
16. None at this time. However, a witness list will be provided prior to any hearing in this matter. Applicant reserves the right to supplement this response.

17. Describe in detail, and furnish copies of, all studies, analyses, projections and forecasts, if any, 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 should the Application be granted.
17. None. Applicant reserves the right to supplement this response.
18. State whether Applicant has been the subject of any complaint, formal or informal, by the PA PUC. If so, describe in detail the identity of the complainant, the date and docket number of the complaint, the substance of the complaint and the ultimate resolution of the complaint.
18. None.
19. Provide copies of all exhibits to be presented at the hearing on behalf of the Applicant in this proceeding.
19. None at this time. Applicant reserves the right to supplement this response.
20. Provide a copy of the Applicant's most recent balance sheet, as well as a projected income statement for the proposed service. If none are available, describe in detail the financial resources available to the Applicant that will enable it to purchase or lease all necessary facilities, equipment, services and vehicles necessary to begin the proposed operations. Provide copies of all supporting documentation, such as bank statements, loan commitment letters, etc.
20. Unavailable at this time. Applicant reserves the right to supplement this response.
21. Have any of the owners of the Applicant ever been convicted of a crime? If so, provide the date of the conviction and identify the crime for which they were convicted.
21. Objection. This request is overly broad and unduly burdensome and unlikely to lead to admissible evidence. To the extent a response is required no.

22. If any of the Applicant's proposed witnesses will testify about problems they have experienced with existing taxi service they have used in the past in the applied-for territory, identify the companies that provided the service and the dates, as near as can be remembered, of the problematic service, and describe the nature of the problems experienced.

22. None at this time. However, a witness list will be provided prior to any hearing in this matter. Applicant reserves the right to supplement this response.

23. Has the Applicant provided any Pennsylvania intrastate passenger transportation service for compensation during the past 24 months?

23. No

24. If the answer to request number 23 is yes, provide, as near as can be remembered, the number of such trips provided, the type of service provided (e.g. taxi, limousine, etc.), the dates of the trips, and the amount of compensation received for each trip.

24. N/A

25. Provide a detailed description of the Applicant's plans for vehicle inspections, maintenance and repair. The description should include, but not be limited to, the frequency and scope of routine inspections and maintenance, the identification of the person(s) who will perform repair work on the vehicles, and a description of the Applicant's plans for maintaining vehicle cleanliness.

25. Objection. This request is overbroad and unduly burdensome and unlikely to lead to admissible evidence. To the extent a response is required applicant will inspect its vehicles as needed but no less than 2 times weekly to ensure they are in proper working order and clean. Each vehicle will be inspected annually pursuant to Pennsylvania regulations. At this time the person to perform work is unknown. Applicant reserves the right to supplement this response.

26. Provide a detailed description of the Applicant's plans for employee and driver hiring and training standards. The description should include, but not be limited to, minimum qualifications for each position, periodic driver record checks, plans, if any, for drug and alcohol testing, and training procedures.

26. Unknown. Applicant reserves the right to supplement this response.

27. How many drivers does the Applicant intend to initially use to provide the applied for taxi service? Explain how this number will be sufficient to cover the service territory requested in the application.

27. Unknown. Applicant reserves the right to supplement this response.

28. Does the Applicant intend to operate 24 hours a day, 7 days a week? If not, during what hours of the day and days of the week does the Applicant intend to operate?

28. yes

29. Identify all facilities (office space, garage space, repair facilities, etc.), equipment (vehicles, office equipment, communications equipment, etc.) and services (phone, communications, insurance, advertising, etc.) Applicant anticipates having to either purchase or lease in order to begin providing the proposed taxi service.

29. Unknown. Applicant reserves the right to supplement this response.

30. What is the total amount of money the Applicant anticipates having to spend in order to obtain all of the facilities, equipment and services that will be necessary to begin providing the proposed taxi service?

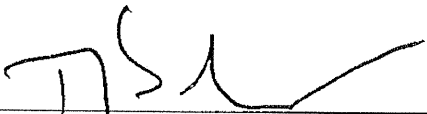
30. Unknown. Applicant reserves the right to supplement this response.

Date: July 13, 2015

John W. Sweet, Esq.  
620 South 13th Street  
Harrisburg, PA 17104  
john@sweetfirm.com  
717-836-0229

### VERIFICATION

I, Timothy J. Schwartz, President of Autocab, Inc., hereby state that the facts set forth concerning Autocab, Inc., in the foregoing Motion for General Continuance are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. §4904 (relating to unsworn falsification to authorities).



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Timothy J. Schwartz

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Administrative Law Judge Dennis J. Buckley, Presiding

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Application of Amigo Cab, LLC for : Docket No. A-2015-2475776  
Approval to Provide Taxi Service Between :  
Points in the Counties of Berks and :  
Lancaster to Points in Pennsylvania and :  
return :  
:

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I hereby certify that I have this 4<sup>th</sup> day of September, 2015 served a true and correct copy of the foregoing Motion of Autocab, Inc. for General Continuance, upon the persons and in the manner set forth below:

**VIA EMAIL AND FIRST CLASS MAIL, POSTAGE PREPAID**

The Honorable Dennis J. Buckley  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
Post Office Box 3265  
Harrisburg, PA 17105-3265  
[debuckley@pa.gov](mailto:debuckley@pa.gov);

John W. Sweet, Esquire  
The Sweet Firm  
620 South 13<sup>th</sup> Street  
Harrisburg, PA 17104  
[John@SweetFirm.com](mailto:John@SweetFirm.com)  
*Counsel for Amigo Cab, LLC*



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Thomas T. Niesen  
PA Attorney ID No. 31379