

MOSES K. ROSENBERG
ARTHUR L. BERGER
FRANCIS B. HAAS, JR.
G. THOMAS MILLER
DONALD R. WASEL
RICHARD R. LEFEVER
J. THOMAS MENAKER
CLYDE W. MCINTYRE
S. BERNE SMITH
ROD J. PERA
EDWARD W. ROTHMAN
ROBERT A. MILLS
W. JEFFRY JAMOUNEAU
HERBERT R. NURICK
DAVID E. LEHMAN
NORMAN I. WHITE
F. MURRAY BRYAN
RICHARD W. STEVENSON
WILLIAM A. CHESNUTT
HENRY R. MACHNICHOLAS
WILLIAM M. YOUNG, JR.
ROBERT M. CHERRY
DAVID B. DISNEY
H. LEE ROUSSEL
MAURICE A. FRATER
C. GRAINGER BOWMAN

JOHN S. OYLER
DELANO M. LANTZ
HARVEY FREEDENBERG
EDWARD J. RIEHL
JASON S. SHAPIRO
ERIC L. BROSSMAN
ROBERT D. STETS
TERRY R. BOSSERT
MARY JANE FORBES
JEFFREY B. CLAY
DAVID M. KLEPPINGER
NEAL S. WEST
JESSIE L. SMITH
BRUCE A. FELDMAN
FRANKLIN A. MILES, JR.
MICHAEL A. DOCTROW
MICHAEL G. JARMAN
STEPHEN A. MOORE
DANA S. SCADUTO
BARBARA S. KAHOE
ELIZABETH A. DOUGHERTY
ALAN R. BOYNTON, JR.
GARY F. YENKOWSKI
DIANE M. TOKARSKY
JAMES J. DODD-O

MCNEES, WALLACE & NURICK
ATTORNEYS AT LAW

100 PINE STREET
P. O. BOX 1166
HARRISBURG, PA. 17108-1166
TELEPHONE (717) 232-8000

STERLING G. MCNEES
1923-1959

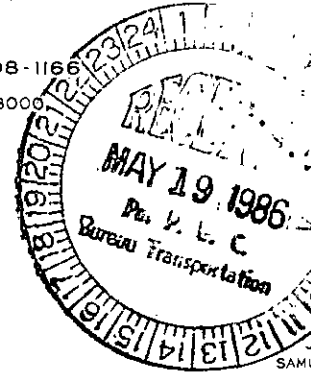
DAVID M. WALLACE
1942-1967

RETIRED PARTNERS

HARRY H. FRANK
JAMES H. BOOSER
JAMES W. HAGAR
JAMES H. KING

OF COUNSEL

GILBERT NURICK
EDWARD C. FIRST, JR.
ROBERT H. GRISWOLD
JEFFERSON C. BARNHART
SAMUEL A. SCHRECKENGAUST, JR.



May 16, 1986

In re: Towaway Express, Inc.
A-00106208
(Emergency Temporary Authority Application)

RECEIVED

MAY 16 1986
SECRETARY'S OFFICE
Public Utility Commission

Jerry Rich, Secretary
Pennsylvania Public Utility Commission
Post Office Box 3265
Harrisburg, PA 17120

Dear Mr. Rich:

We are counsel for Towaway Express, Inc. Please find enclosed the original and two copies of an application for emergency temporary authority with all attachments, including an insurance binder, shipper support letter, outline of rates, and check in the amount of \$25.00 to cover the filing fee. The transportation need, which is somewhat unusual, is set forth in the supporting materials. Basically, there is an immediate need to have a large fleet of trailers moved from various terminal facilities and other locations of Hall's Motor Transit Company to the facilities of a fleet liquidator in Middletown. The trailers involved are not owned by Hall's, but were under lease to Hall's, and they must be removed from the premises immediately so that the terminals of Hall's can be closed and these trailers are not mixed with the assets of Hall's, which is currently undergoing a bankruptcy reorganization.

The applicant already has on file an unopposed permanent authority application which exceeds in scope the authority being sought by the emergency temporary application. It is expected that the need for emergency temporary authority herein will not exceed thirty days. It is respectfully requested that this matter be brought to the attention of the Commission at the next public meeting, which we understand will be May 22, 1986. Thank you for your

DOCUMENT
FOLDER

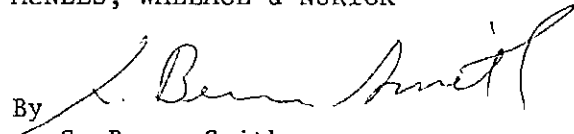
Jerry Rich, Secretary
May 16, 1986
Page Two

attention to this matter.

Very truly yours,

McNEES, WALLACE & NURICK

By



S. Berne Smith

SBS/ec

Enclosures

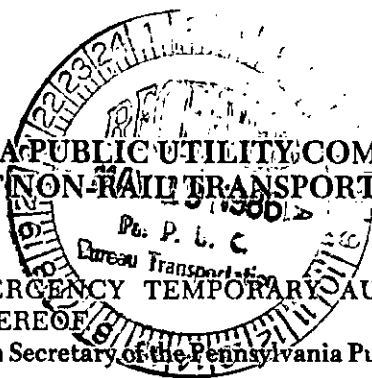
cc: Mr. Bruce Bigelow (w/enc.)
Mr. Thomas S. Sheaffer (w/enc.)
Mr. John F. Dupes (w/enc.)

RECEIVED

PUC-182 MAY 16 1986

SECRETARY'S OFFICE
PENNSYLVANIA PUBLIC UTILITY COMMISSION
Public Utility Commission BUREAU OF NON-RAIL TRANSPORTATION

A-00106208



APPLICATION FOR x EMERGENCY TEMPORARY AUTHORITY; _____ TEMPORARY AUTHORITY; OR _____ EXTENSION THEREOF
(File original and 2 copies of application with Secretary of the Pennsylvania Public Utility Commission, P.O. Box 3265, Harrisburg, PA 17120)

1. Towaway Express, Inc.
(Name of applicant) (Trade name, if any)

6780 Carlisle Pike Mechanicsburg PA 17055
(Street address) (City) (State & Zip Code)

2. Applicant is an _____ individual _____ partnership x corporation. (If individual or partnership and using a trade name, applicant must submit evidence of compliance with the provisions of the Fictitious Names Act of June 28, 1917, as amended. Applicant corporations must submit articles of incorporation and charter purpose; and a foreign corporation must submit evidence that it is qualified to do business in Pennsylvania due to its registration with the Secretary of the Commonwealth.)

3. Applicant requests authority for 30 days to provide service as a x common or _____ contact carrier by motor vehicle, _____ broker or _____ freight forwarder in intrastate commerce.
(Give description of type of service and area to be served.)
See attached statement

In support of this request, applicant states:

4. It has has not heretofore held emergency temporary authority or temporary authority for the service here proposed. If it has, specify docket number, total time granted, and expiration date.

5. It is is not now operating as a motor carrier under a certificate or permit. If so operating, give docket number.

6. If this application is for temporary authority, applicant does does not have pending an application for permanent authority to perform the same service as proposed herein. If it has, give docket number, filing date and status. If applicant does not have pending permanent application currently on file, application for permanent authority should be attached.
N/A

7. If this application is for emergency temporary authority, and not accompanied by an application for corresponding permanent authority, state when you intend to file the application for permanent authority.
Permanent application is pending at A. 00106208

8. It has has not previously made application on which final action has been taken, for authority to perform the same service, in whole or in part, as that here proposed. If it has, state whether for emergency temporary authority, temporary or permanent authority, give docket number, and date and basis of final action.

9. It previously has has not opposed any other carrier's application for authority to perform the service here proposed; and/or does does not have knowledge of any such application. If answer is affirmative, give other applicant's name, address, docket number, or other information identifying that application.

10. It does does not intend to interline the authority here applied for with other carriers. If so intended, specify the point or points at which it is proposed to interline with another carrier and such other carrier's docket number.

11. It attaches to each copy of this application a map showing: The route or routes and points to be served or a description of the territory or territories in or between which service is proposed.
Not necessary, because territory is clear.

DOCUMENT FOLDER

DOCKETED
APPLICATION DOCKET
MAY 19 1986
ENTRY No.

12. It attaches a letter or letters of shipper support, each statement of support will contain detailed information as provided by 52 Pa. Code § 3.382(c)(3) as follows:

Description of the specific commodity or commodities to be transported, points or areas to, from or between which the transportation will be provided; volume of traffic involved, frequency of movement, and how transported; how soon the service must be provided; how long the need for service likely will continue, and whether the persons supporting the ETA or TA will support a permanent authority application; specific explanation of consequences if service is not made available; circumstances which created an immediate need for the requested service; whether existing carriers have been contacted, dates of contacts and result of efforts; names and addresses of existing carriers, a list of those who have failed or refused to provide service, and reasons given for any failure or refusal; and whether the person supporting the application has supported any recent application for permanent authority, TA or ETA covering all or any part of the desired service within the year preceding the date of its statement; if yes, give the carrier's name, address, and docket number, if known, and state whether the application was granted or denied and the date of the action.

(Attach plain white sheet for description and/or statements)

Applicant further states that:

13. It is aware that a grant of the authority here requested will create no presumption that corresponding permanent authority will hereafter be granted.

14. If the authority here requested is granted, applicant will comply with the tariff and insurance requirements of the Public Utility Law before beginning operation.

15. It does does not desire telephoned notice, collect, of the action taken on this application.

WHEREFORE, The Applicant herein prays that the Commission grant to Applicant Temporary Authority as herein requested. Dated this 16th day of May, 1986

Applicant sign here

SS: THOMAS S. SHEAFFER

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF DAUPHIN

Personally appeared before me, a notary public in and for said County and Commonwealth Thomas S. Sheaffer who being duly sworn according to law doth depose and say that the facts as contained in the foregoing application are true and correct to the best of applicant's knowledge and belief.

Sworn and subscribed before me this

16th day of May, 1986

(Signature of official authorized to administer oaths)

Jennie E. Row, NOTARY PUBLIC
My Commission Expires January 19, 1989
Harrisburg, PA Dauphin County

ARTICLES OF INCORPORATION

COMMONWEALTH OF PENNSYLVANIA
 DEPARTMENT OF STATE - CORPORATION BUREAU
 308 NORTH OFFICE BUILDING, HARRISBURG, PA 17120

PLEASE INDICATE (CHECK ONE) TYPE CORPORATION:

- DOMESTIC BUSINESS CORPORATION
- DOMESTIC BUSINESS CORPORATION
A CLOSE CORPORATION - COMPLETE BACK
- DOMESTIC PROFESSIONAL CORPORATION
ENTER BOARD LICENSE NO.

FEE
\$75.00

010 NAME OF CORPORATION (MUST CONTAIN A CORPORATE INDICATOR UNLESS EXEMPT UNDER 15 P.S. 2908 B)

Towaway Express, Inc.

011 ADDRESS OF REGISTERED OFFICE IN PENNSYLVANIA (P.O. BOX NUMBER NOT ACCEPTABLE)

2320 North Second Street P.O. Box 1855 Harrisburg, Penna 17110

012 CITY

Harrisburg,

013 COUNTY

Dauphin

014 STATE

Pennsylvania

015 ZIP CODE

17110

016 EXPLAIN THE PURPOSE OR PURPOSES OF THE CORPORATION

To do or engage in the business of hauling of transportation equipment; To do or engage in the business of general common carrier trucking; To own or lease personal and real property of any kind; To do or engage in any lawful business for which corporations may be organized under the Pennsylvania Business Corporation Law.

(ATTACH 8 1/2 x 11 SHEET IF NECESSARY)

The Aggregate Number of Shares, Classes of Shares and Par Value of Shares Which the Corporation Shall have Authority to Issue:

040 Number and Class of Shares 100,000 shares of common stock	041 Stated Par Value Per Share If Any \$.01	042 Total Authorized Capital \$1,000.00	043 Term of Existence Perpetual
---	--	--	------------------------------------

The Name and Address of Each Incorporator, and the Number and Class of Shares Subscribed to by each Incorporator

050 Name	051, 052 053, 054 Address (Street, City, State, Zip Code)	Number & Class of Shares
Robert Chernicoff	2610 Gateway Drive Harrisburg, Pa 17110	5 shares common

(ATTACH 8 1/2 x 11 SHEET IF NECESSARY)

IN TESTIMONY WHEREOF, THE INCORPORATOR (S) HAS (HAVE) SIGNED AND SEALED THE ARTICLES OF INCORPORATION

THIS 16th DAY OF January 19 85

Robert Chernicoff

- FOR OFFICE USE ONLY -

030 FILED JAN. 16 1985	002 CODE	003 REV BOX	SEQUENTIAL NO. 4334	100 MICROFILM NUMBER 85051447
<i>William P. Davis</i>	REVIEWED BY	004 SIC	AMOUNT 75	001 CORPORATION NUMBER 85-2810
	DATE APPROVED	CERTIFY TO REV. <input checked="" type="checkbox"/> LJC <input checked="" type="checkbox"/> OTHER	INPUT BY 1114RP	LOG IN
DATE REJECTED	MAILED BY	DATE	VERIFIED BY 21	LOG IN (REFILE)
Secretary of the Commonwealth Department of State Commonwealth of Pennsylvania				LOG OUT
				LOG OUT (REFILE)

Commonwealth of Pennsylvania
Department of State

85051448



CERTIFICATE OF INCORPORATION

Office of the Secretary of the Commonwealth
To All to Whom These Presents Shall Come, Greeting:

Whereas, Under the provisions of the Laws of the Commonwealth, the Secretary of the Commonwealth is authorized and required to issue a "Certificate of Incorporation" evidencing the incorporation of an entity.

Whereas, The stipulations and conditions of the Law have been fully complied with by

TOWAWAY EXPRESS, INC.

Therefore, Know Ye, That subject to the Constitution of this Commonwealth, and under the authority of the Laws thereof, I do by these presents, which I have caused to be sealed with the Great Seal of the Commonwealth, declare and certify the creation, erection and incorporation of the above in deed and in law by the name chosen hereinbefore specified.

Such corporation shall have and enjoy and shall be subject to all the powers, duties, requirements, and restrictions, specified and enjoined in and by the applicable laws of this Commonwealth.

Given under my Hand and the Great Seal of the Commonwealth,
at the City of Harrisburg, this 16th day
of January in the year of our
Lord one thousand nine hundred and eighty-five
and of the Commonwealth the two hundred ninth



William R. Davis
Secretary of the Commonwealth

0852810

Statement in Answer to Paragraph 3

Towaway Express, Inc.
A-00106208
Emergency Temporary Authority

STATEMENT OF AUTHORITY SOUGHT

To transport trailers (excluding mobile homes, travel trailers, and office trailers), trailer chassis, trailer converter dollies, and containers, leased by McDonnell Douglas Finance Corporation to Hall's Motor Transit Company for the account of Chicago Fleet Liquidators from points in Pennsylvania to the facilities of Dupes' Garage, Londonderry Township, Dauphin County, PA.

SUPPLEMENTAL STATEMENT OF APPLICANT

Towaway Express, Inc., has been a common carrier transporting transportation equipment between points in the United States since early 1985. Our ICC operating authority is at MC-181480, and our permanent authority dates from September 30, 1985. Prior thereto we had temporary authority. In the spring of 1985, we filed an application for permanent authority with Pennsylvania Public Utility Commission which has been docketed at A-00106208. As amended, that application is unopposed and we are awaiting assignment of the case for modified procedure. A copy of the "Revised Restrictive Amendment" dated March 21, 1986, which eventually resulted in the withdraw of all protests, is attached hereto. The present application for emergency temporary authority, as set forth in the answer attached to this application as Statement in Answer to Paragraph 3, is fully encompassed by the authority sought in our permanent application, as amended.

The emergency temporary authority being sought in this application became known to us early yesterday, May 15, when we were contacted by John F. Dupes of Dupes' Garage in Middletown. On May 14 he had been appointed agent for McDonnell Douglas Finance Corporation and Chicago Fleet Liquidators to retrieve and hold for sale a fleet of trailers which McDonnell Douglas had leased to Hall's Motor Transit Company. Hall's has recently gone into bankruptcy, and these trailers must be promptly removed from the various terminals of Hall's immediately, so that

those terminals can be closed. There are over 250 trailers situated in the Pennsylvania area, most of which have not as yet been actually located. That process is being performed right now, and there are presently over 50 trailers which are all ready to be moved.

Towaway Express, Inc., has several unique tractor units which permit us to transport ^{two} 28 1/2 foot trailers in tandem. Mr. Dupes was aware of our ability and the availability of this type equipment, because he had made these tractors for us. We are prepared to perform the service immediately upon approval of Pennsylvania Public Utility Commission.

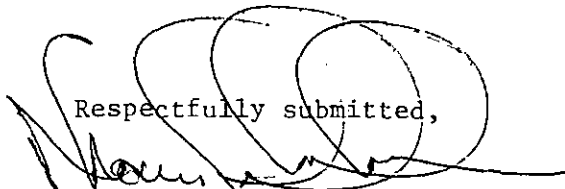
The transportation will be from the location of the trailers in Pennsylvania to the facilities of Mr. Dupes. We have also been hired to perform transportation of trailers located at facilities of Hall's outside the state of Pennsylvania, and we can, of course, perform that transportation under our existing interstate operating authority.

Being submitted herewith is evidence of our insurance coverage which we ask be accepted on a temporary basis. What is attached is an insurance binder. Also, attached is a proposed schedule of rates, indicating the basis of our charges if this application is approved. Upon approval, we will take steps to file the tariff in accordance with the requirements of the Commission.

Although this application is our first for operating authority with Pennsylvania Public Utility Commission, Towaway Express, Inc., is an established carrier. I have been involved in transportation for many years and was an employee of Morgan Drive Away, Inc., prior to leaving that

company and forming my own corporation. By virtue of our location in the Central Pennsylvania area, we are ideally situated to perform the somewhat unusual transportation requirement of Chicago Fleet Liquidators with respect to the trailer fleet of Hall's which was leased from McDonnell Douglas Finance Corporation.

A supporting letter from Mr. Dupes, as agent for McDonnell Douglas and Chicago Fleet Liquidators is also attached hereto. I urgently request that this matter be presented to the Commission immediately for action. If our permanent authority application, as amended, were already approved, it would not be necessary for me to seek emergency temporary authority for this particular transportation. The fact that my permanent authority application, as amended, is unopposed is an indication that existing carriers are not concerned about the type of transportation involved herein and which would be authorized to my company on a permanent basis. I respectfully submit that an emergency situation does exist in this case and that approval of the emergency temporary authority will be consistent with the public interest.


Respectfully submitted,

Thomas S. Sheaffer, President
Towaway Express, Inc.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In re:

APPLICATION OF

TOWAWAY EXPRESS, INC.
A-00106208

REVISED RESTRICTIVE AMENDMENT

Applicant hereby amends paragraph 8 of the above-captioned application so that the description of the authority which applicant seeks shall now read as follows:

To transport (1) trailers (excluding mobile homes, travel trailers, and office trailers), trailer chassis, trailer converter dollies, and containers, and (2) materials, equipment, parts, and supplies used in the manufacture, assembly, servicing, distribution, and sale of the commodities named in (1) above, between points in Pennsylvania;

subject to the following conditions:

1. That no right, power or privilege is granted to render service for Morgan Corp. from its facilities;
2. That no right, power or privilege is granted to render service from the facilities of Boyertown Auto Body;
3. That no right, power or privilege is granted to render service for Cliff Industries; Gelco Space; Guest Trailer Rentals, Inc.; or Sauer Industries, t/d/b/a Central Equipment;
4. That no right, power or privilege is granted to render service for Mellon Stuart Company or Sargent Electric Company, between points in that part of Pennsylvania lying in and west of the counties of Bedford, Blair, Clearfield, Elk and McKean;

5. That no right, power or privilege is granted to transport storage trailers for Ruthrauff, Inc., between points in Pennsylvania located on and west of U.S. Highway Route 15; and
6. That no right, power or privilege is granted to transport wrecked or disabled vehicles, or trailers, and replacement vehicles, or trailers; when the origin or destination point is other than the scene of an accident or breakdown; with the use of flatbed and lowboy trailers; between points in the borough of Hollidaysburg, Blair County, and within an airline distance of one hundred fifty (150) statute miles of the limits of said borough.

TOWAWAY EXPRESS, INC.

By Herbert R. Nurick
Herbert R. Nurick, Esquire
McNees, Wallace & Nurick
P. O. Box 1166
100 Pine Street
Harrisburg, PA 17108-1166
(717) 232-8000

Counsel for Applicant

Dated: March 21, 1986



SET TAB STOPS AT ARROWS

INSURANCE BINDER

THIS BINDER IS A TEMPORARY INSURANCE CONTRACT SUBJECT TO THE CONDITIONS SHOWN ON THE REVERSE SIDE OF THIS FORM.

Binder No.
AT1-381-037377
016

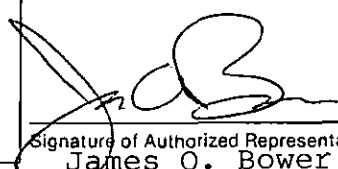
NAME AND ADDRESS OF AGENCY <input type="checkbox"/> James O. Bower Ins., Inc. P. O. Box 213 Camp Hill, Pa. 17011	COMPANY Liberty Mutual Ins. Co.
	Effective 12:01 a ^m 2-4 19 86 Expires <input type="checkbox"/> 12:01 am <input type="checkbox"/> Noon 2-4- 1987
	<input type="checkbox"/> This binder is issued to extend coverage in the above named company per expiring policy # _____ (except as noted below)

NAME AND MAILING ADDRESS OF INSURED Towaway Express Inc. 6780 Carlisle Pike Mechanicsburg, Pa. 17055	Description of Operation/Vehicles/Property
---	--

Type and Location of Property	Coverage/Perils/Forms	Amt of Insurance	Ded.	Coins. %
PROPERTY				

LIABILITY	Type of Insurance <input type="checkbox"/> Scheduled Form <input type="checkbox"/> Comprehensive Form <input type="checkbox"/> Premises/Operations <input type="checkbox"/> Products/Completed Operations <input type="checkbox"/> Contractual <input type="checkbox"/> Other (specify below) <input type="checkbox"/> Med. Pay. \$ _____ Per Person \$ _____ Per Accident <input type="checkbox"/> Personal Injury	Coverage/Forms <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C	Limits of Liability <table border="1"> <thead> <tr> <th></th> <th>Each Occurrence</th> <th>Aggregate</th> </tr> </thead> <tbody> <tr> <td>Bodily Injury</td> <td>\$</td> <td>\$</td> </tr> <tr> <td>Property Damage</td> <td>\$</td> <td>\$</td> </tr> <tr> <td>Bodily Injury & Property Damage Combined</td> <td>\$</td> <td>\$</td> </tr> <tr> <td>Personal Injury</td> <td></td> <td>\$</td> </tr> </tbody> </table>			Each Occurrence	Aggregate	Bodily Injury	\$	\$	Property Damage	\$	\$	Bodily Injury & Property Damage Combined	\$	\$	Personal Injury		\$
		Each Occurrence	Aggregate																
	Bodily Injury	\$	\$																
Property Damage	\$	\$																	
Bodily Injury & Property Damage Combined	\$	\$																	
Personal Injury		\$																	
AUTOMOBILE	<input checked="" type="checkbox"/> Liability <input type="checkbox"/> Non-owned <input type="checkbox"/> Hired <input type="checkbox"/> Comprehensive-Deductible \$ _____ <input type="checkbox"/> Collision-Deductible \$ _____ <input type="checkbox"/> Medical Payments \$ _____ <input checked="" type="checkbox"/> Uninsured Motorist \$ 35,000. <input type="checkbox"/> No Fault (specify): <input checked="" type="checkbox"/> Other (specify): - BFPB		Limits of Liability <table border="1"> <tbody> <tr> <td>Bodily Injury (Each Person)</td> <td>\$</td> </tr> <tr> <td>Bodily Injury (Each Accident)</td> <td>\$</td> </tr> <tr> <td>Property Damage</td> <td>\$</td> </tr> <tr> <td>Bodily Injury & Property Damage Combined</td> <td>\$ 750,000</td> </tr> </tbody> </table>		Bodily Injury (Each Person)	\$	Bodily Injury (Each Accident)	\$	Property Damage	\$	Bodily Injury & Property Damage Combined	\$ 750,000							
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	Bodily Injury (Each Accident)	\$																	
Property Damage	\$																		
Bodily Injury & Property Damage Combined	\$ 750,000																		
		<input type="checkbox"/> WORKERS' COMPENSATION — Statutory Limits (specify states below) <input type="checkbox"/> EMPLOYERS' LIABILITY — Limit \$ _____																	

SPECIAL CONDITIONS/OTHER COVERAGES

NAME AND ADDRESS OF <input type="checkbox"/> MORTGAGEE <input type="checkbox"/> LOSS PAYEE <input type="checkbox"/> ADD'L INSURED Pennsylvania Public Utilities Commission Bureau of Transportation North Office Building Harrisburg, Pa. 17120 LOAN NUMBER	 Signature of Authorized Representative James O. Bower	5-16-86 Date
--	--	-----------------

CONDITIONS

This Company binds the kind(s) of insurance stipulated on the reverse side. This insurance is subject to the terms, conditions and limitations of the policy(ies) in current use by the Company.

This binder may be cancelled by the Insured by surrender of this binder or by written notice to the Company stating when cancellation will be effective. This binder may be cancelled by the Company by notice to the Insured in accordance with the policy conditions. This binder is cancelled when replaced by a policy. If this binder is not replaced by a policy, the Company is entitled to charge a premium for the binder according to the Rules and Rates in use by the Company.

LIBERTY MUTUAL



LIBERTY MUTUAL INSURANCE COMPANY - BOSTON

DECLARATIONS TRUCKERS POLICY

ACCOUNT NO 03 73 77	SUB-ACCT NO.							
POLICY NO AT1- 381-037377-016	TD/CD 11/5	SALES OFFICE Mechanicsburg	CODE 357	SALES REPRESENTATIVE A/R	CODE 8011	N/R 1	1ST YEAR 86	

ITEM ONE Named insured **Towaway Express, Inc.** James O. Bower
 and Mailing Address **6780 Carlisle Pike** P.O. Box 213
Mechanicsburg, PA 17055 Camp Hill, PA 17011

Named insured is **Corporation** and occupation or business is **Trucker**

Policy Period: From **2-4-86** To **2-4-87**
12:01 A.M. Standard Time at the address of the named insured indicated in Item One

ITEM TWO SCHEDULE OF COVERAGES AND COVERED AUTOS

This policy provides only those coverages where a charge is shown in the premium column below. Each of these coverages will apply only to those autos shown as covered autos. Autos are shown as covered autos for a particular coverage by the entry of one or more of the symbols from ITEM THREE next to the name of the coverage.

Coverages	COVERED AUTOS (Entry of one or more of the symbols from ITEM THREE shows which autos are covered autos)	LIMIT THE MOST WE WILL PAY FOR ANY ONE ACCIDENT OR LOSS	PREMIUM
LIABILITY INSURANCE	41	\$ 750,000	\$ 146,302.
PERSONAL INJURY PROTECTION (or equivalent No-fault coverage)	44	SEPARATELY STATED IN EACH P.I.P. ENDORSEMENT.	\$ 16,048.
ADDED PERSONAL INJURY PROTECTION (or equivalent added No-fault coverage)		SEPARATELY STATED IN EACH ADDED P.I.P. ENDORSEMENT.	\$
PROPERTY PROTECTION INSURANCE (Michigan only)		SEPARATELY STATED IN THE P.P.I. ENDORSEMENT.	\$
MEDICAL PAYMENTS INSURANCE		\$	\$
UNINSURED MOTORISTS INSURANCE	45	SEPARATELY STATED IN THE SCHEDULE OF LIMITS FOR UNINSURED MOTORISTS INSURANCE.	\$ 680.
TRAILER INTERCHANGE INSURANCE COMPREHENSIVE COVERAGE		ACTUAL CASH VALUE, COST OF REPAIR OR \$ WHICHEVER IS LESS.	\$
TRAILER INTERCHANGE INSURANCE SPECIFIED PERILS COVERAGE		ACTUAL CASH VALUE, COST OF REPAIR OR \$ WHICHEVER IS LESS, MINUS \$25 Ded. FOR EACH COVERED AUTO FOR LOSS CAUSED BY MISCHIEF OR VANDALISM.	\$
TRAILER INTERCHANGE INSURANCE COLLISION COVERAGE		ACTUAL CASH VALUE, COST OF REPAIR OR \$ WHICHEVER IS LESS, MINUS \$ Ded. FOR EACH COVERED AUTO.	\$
PHYSICAL DAMAGE INSURANCE COMPREHENSIVE COVERAGE		ACTUAL CASH VALUE OR COST OF REPAIR, WHICHEVER IS LESS, MINUS \$ Ded. FOR EACH COVERED AUTO. FOR ALL LOSS EXCEPT FIRE OR LIGHTNING.	\$
PHYSICAL DAMAGE INSURANCE SPECIFIED PERILS COVERAGE		ACTUAL CASH VALUE OR COST OF REPAIR, WHICHEVER IS LESS, MINUS \$25 Ded. FOR EACH COVERED AUTO. FOR LOSS CAUSED BY MISCHIEF OR VANDALISM.	\$
PHYSICAL DAMAGE INSURANCE COLLISION COVERAGE		ACTUAL CASH VALUE OR COST OF REPAIR, WHICHEVER IS LESS, MINUS \$ Ded. FOR EACH COVERED AUTO.	\$
PHYSICAL DAMAGE INSURANCE TOWING AND LABOR		\$25 FOR EACH DISABLEMENT OF A PRIVATE PASSENGER AUTO.	\$
PREMIUM FOR ENDORSEMENTS			\$
TOTAL POLICY ADVANCE PREMIUM ▶			\$ 163,030.

The estimated total premium for this policy is based on the exposures you told us you would have when this policy began. We will compute your final premium due when we determine your actual exposures. The estimated total premium will be credited against the final premium due and you will be billed for the balance, if any. If the estimated total premium exceeds the final premium due you will get a refund. To determine your final premium due we may examine your records at any time during the period of coverage and up to three years afterward. If this policy is issued for more than one year, the premium shall be computed annually based on our rates or premiums in effect at the beginning of each year of the policy.

This Policy is not valid unless countersigned
 by our Authorized Representative

By _____
 AUTHORIZED REPRESENTATIVE

LOC. CODE 1	RENEWAL OF New	TYPED gs 4/17/86	POL. NO. <input type="checkbox"/>	AUDIT BASIS 0	AUDIT SYMBOLS Owned <input type="checkbox"/> Hired <input type="checkbox"/>	RATING BASIS — Exp. Rated <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> Retro <input type="checkbox"/> <input checked="" type="checkbox"/>	ARC \$ _____	ACCTG. ENTRY On or Exp Policy
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SET TAB STOPS AT ARROWS

INSURANCE BINDER

THIS BINDER IS A TEMPORARY INSURANCE CONTRACT SUBJECT TO THE CONDITIONS SHOWN ON THE REVERSE SIDE OF THIS FORM.

Binder No.
IM 77 34 33

NAME AND ADDRESS OF AGENCY <input type="checkbox"/> James O. Bower Ins., Inc. P. O. Box 213 Camp Hill, Pa. 17011	COMPANY Continental Insurance Co. Effective 12:01 a ^m 2-1 ,1986 Expires <input type="checkbox"/> 12:01 am <input type="checkbox"/> Noon 2-1 ,1987 <input type="checkbox"/> This binder is issued to extend coverage in the above named company per expiring policy # _____ (except as noted below)
NAME AND MAILING ADDRESS OF INSURED Towaway Express, Inc. 6780 Carlisle Pike Mechanicsburg, Pa. 17055	Description of Operation/Vehicles/Property Trailers-Chassiss - All Vehicles

PROPERTY	Type and Location of Property	Coverage/Perils/Forms	Amt of Insurance	Ded.	Coins. %
	Motor Truck Cargo	Transportation Perils	\$100,000.	\$1000.	Per Disaster

LIABILITY	Type of Insurance <input type="checkbox"/> Scheduled Form <input type="checkbox"/> Comprehensive Form <input type="checkbox"/> Premises/Operations <input type="checkbox"/> Products/Completed Operations <input type="checkbox"/> Contractual <input type="checkbox"/> Other (specify below) <input type="checkbox"/> Med. Pay. \$ Per Person \$ Per Accident \$ <input type="checkbox"/> Personal Injury	Coverage/Forms <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C	Limits of Liability <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>Each Occurrence</th> <th>Aggregate</th> </tr> </thead> <tbody> <tr> <td>Bodily Injury</td> <td>\$</td> <td>\$</td> </tr> <tr> <td>Property Damage</td> <td>\$</td> <td>\$</td> </tr> <tr> <td>Bodily Injury & Property Damage Combined</td> <td>\$</td> <td>\$</td> </tr> <tr> <td>Personal Injury</td> <td>\$</td> <td>\$</td> </tr> </tbody> </table>			Each Occurrence	Aggregate	Bodily Injury	\$	\$	Property Damage	\$	\$	Bodily Injury & Property Damage Combined	\$	\$	Personal Injury	\$	\$
		Each Occurrence	Aggregate																
Bodily Injury	\$	\$																	
Property Damage	\$	\$																	
Bodily Injury & Property Damage Combined	\$	\$																	
Personal Injury	\$	\$																	
AUTOMOBILE	<input type="checkbox"/> Liability <input type="checkbox"/> Non-owned <input type="checkbox"/> Hired <input type="checkbox"/> Comprehensive-Deductible \$ <input type="checkbox"/> Collision-Deductible \$ <input type="checkbox"/> Medical Payments \$ <input type="checkbox"/> Uninsured Motorist \$ <input type="checkbox"/> No Fault (specify): <input type="checkbox"/> Other (specify):		Limits of Liability <table border="1" style="width: 100%; border-collapse: collapse;"> <tbody> <tr> <td>Bodily Injury (Each Person)</td> <td>\$</td> </tr> <tr> <td>Bodily Injury (Each Accident)</td> <td>\$</td> </tr> <tr> <td>Property Damage</td> <td>\$</td> </tr> <tr> <td>Bodily Injury & Property Damage Combined</td> <td>\$</td> </tr> </tbody> </table>		Bodily Injury (Each Person)	\$	Bodily Injury (Each Accident)	\$	Property Damage	\$	Bodily Injury & Property Damage Combined	\$							
	Bodily Injury (Each Person)	\$																	
Bodily Injury (Each Accident)	\$																		
Property Damage	\$																		
Bodily Injury & Property Damage Combined	\$																		

WORKERS' COMPENSATION — Statutory Limits (specify states below) EMPLOYERS' LIABILITY — Limit \$

SPECIAL CONDITIONS/OTHER COVERAGES

NAME AND ADDRESS OF <input type="checkbox"/> MORTGAGEE <input type="checkbox"/> LOSS PAYEE <input type="checkbox"/> ADD'L INSURED Pennsylvania Public Utilities Commission Bureau of Transportation North Office Building Harrisburg, Pa. 17120	<div style="text-align: right;"> Signature of Authorized Representative James O. Bower Jr. </div> <div style="text-align: right;"> 5-16-86 Date </div>
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CONDITIONS

This Company binds the kind(s) of insurance stipulated on the reverse side. This insurance is subject to the terms, conditions and limitations of the policy(ies) in current use by the Company.

This binder may be cancelled by the Insured by surrender of this binder or by written notice to the Company stating when cancellation will be effective. This binder may be cancelled by the Company by notice to the Insured in accordance with the policy conditions. This binder is cancelled when replaced by a policy. If this binder is not replaced by a policy, the Company is entitled to charge a premium for the binder according to the Rules and Rates in use by the Company.

TOWAWAY EXPRESS, INC.

LOCAL MOTOR FREIGHT TARIFF

NAMING RATES

ON

THE TRANSPORTATION OF

TRAILERS AND TRAILER CHASSIS

FROM AND TO

POINTS IN PENNSYLVANIA

MECHANICSBURG, PA. to MIDDLETOWN, PA.

\$55.00 per Trailer

WILLIAMSPORT, PA. to MIDDLETOWN, PA.

\$150.00 per Trailer

WHERE SPECIFIC RATES ARE NOT SPECIFIED:

\$1.50 per mile will
apply to the minimum
charge of \$55.00.

ISSUED BY:

Thomas S. Sheaffer, President
6780 Carlisle Pike
Mechanicsburg, Pa. 17055

John F. Dupes
Dupes' Garage
2971 Roundtop Road
Middletown, PA 17057

May 16, 1986

In re: Towaway Express, Inc.
A-00106208
(ETA Application)

Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17120

Gentlemen:

I am John F. Dupes, owner of Dupes' Garage located at 2971 Roundtop Road, Middletown, PA. My facilities are actually located in Londonderry Township, Dauphin County, PA. I have been appointed agent for McDonnell Douglas Finance Corporation of Long Beach, California, and Chicago Fleet Liquidators to retrieve, store, and hold for sale a fleet of trailers which were leased by McDonnell Douglas to Hall's Motor Transit Company of Mechanicsburg, PA. Attached hereto as Appendix A is a copy of the letter dated May 14, 1986, appointing me agent.

Hall's Motor Transit Company is in bankruptcy and has been closing various terminals. The trailers in question have been leased by McDonnell Douglas to Hall's and are parked at various

locations of Hall's or its shippers around the state and in other states. There are over 250 trailers which are either in Pennsylvania, or are still being located. These are 28-1/2' van type trailers.

Towaway Express, Inc. holds operating authority from the Interstate Commerce Commission which allows it to transport the trailers from points outside of the state of Pennsylvania to my facilities in Middletown. Some of these trailers are located at points in Hagerstown and Baltimore, Maryland. By this present application, Towaway Express, Inc. seeks emergency temporary authority to move trailers which are located in the state of Pennsylvania to my facilities. The actual authority sought is set forth in Appendix B hereto, and it is designed to permit the applicant to pick up trailers at whatever location they may be found in Pennsylvania and bring them to my facilities.

At the present time, I know of at least 52 trailers located at Mechanicsburg, PA, and two at Williamsport, PA. The rest of the trailers are still to be located. As soon as they are located, the trailers are to be moved to my facilities from which they will be sold.

Towaway Express, Inc. has two specially constructed tractors which permit it to move two of these trailers at one time. These tractors are called "jiff lox tractors" and have a detachable

fifth wheel and axle which permits two trailers to be moved in tandem by one tractor. This is efficient and reduces the expense of moving the trailers. I am not aware of any other carrier which has this type of vehicle or the ability to respond promptly enough to meet the need which exists with respect to the aforementioned trailers. I expect that the need will last less than 30 days.

The urgency to move the trailers arises because Hall's is in bankruptcy and must close down the terminals at which these trailers are presently located. The terminals cannot be fully closed until the trailers are removed. Because they are not Hall's trailers, the trailers are not part of the bankruptcy assets of Hall's, and they must be taken off the premises immediately.

I have not supported Towaway Express, Inc. for other operating authority, nor have I supported anyone else for this authority. This probably will be a one-shot need and is the result of the unusual circumstances caused by Hall's bankruptcy.

Applicant is located in central Pennsylvania with proper equipment very convenient to move the trailers. Please present this request for emergency temporary authority to the Commission for action as soon as possible because I need the service right now.

Pennsylvania Public Utility Commission
May 16, 1986
Page 4

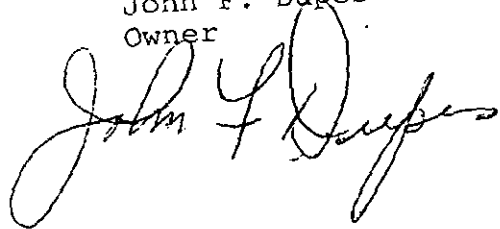
I certify that the matters set forth in this letter are true and correct to the best of my knowledge, information, and belief.

Sincerely,

DUPES' GARAGE

By

John F. Dupes
Owner

A handwritten signature in cursive script that reads "John F. Dupes". The signature is written in black ink and is positioned below the typed name and title.



MCDONNELL DOUGLAS FINANCE CORPORATION

340 GOLDEN SHORE, LONG BEACH, CA 90802-4296 (213) 491-3000
MAIL TO: P.O. BOX 580, LONG BEACH, CALIFORNIA 90801-0580

Direct Dial: (213) 491-3018

May 14, 1986

TO WHOM IT MAY CONCERN:

Mr. Ian Naismith of Chicago Fleet Liquidators and his agents have been retained by McDonnell Douglas Finance Corporation ("MDFC") to repossess and sell the ~~tractors~~^{Trailers} on lease to Hall's Motor Transit. Any questions in regards to this repossession can be confirmed through my office.

Doby A. Rose
Doby A. Rose
Director
Equipment Portfolio

DAR/cp

Mr. John Dupes is hereby appointed as our agent to pick up McDonnell Douglas Trailers, we will appreciate any assistance you may be able to give him
Edil Felfor Chicago Fleet

Appendix A

JOHN L. VIEHDORFER
Director of Linehaul Equipment

6060 Carlisle Pike
Mechanicsburg, PA 17055

(717) 790-8730

ATTENTION: ...

(213) 491-3018

May 14, 1986

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Doby A. Rose
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Director
Equipment Portfolio

DAR/cp

Mr. John Dupes is hereby appointed as our agent to pick up the McDonnell Douglas Trailers, we will appreciate any assistance you may be able to give him.
Earl Fulford Chicago Fleet

IAN NAISMITH'S
Chicago Fleet Liquidator's
AGENT FOR MAJOR CORPORATIONS AND LEASE COMPANY'S NATIONWIDE

717-944-6135

EARL FULFORD

DUPES GARAGE

STATE INSPECTION • TRACTOR • TRAILER & AUTO

925 171ST STREET
EAST HAZELCREST ILL.
312-335-0161

JOHN DUPES
PROPRIETOR

2971 ROUND TOP ROAD
MIDDLETOWN, PA 17057

Towaway Express, Inc.
A-00106208
Emergency Temporary Authority

STATEMENT OF AUTHORITY SOUGHT

To transport trailers (excluding mobile homes, travel trailers, and office trailers), trailer chassis, trailer converter dollies, and containers, leased by McDonnell Douglas Finance Corporation to Hall's Motor Transit Company for the account of Chicago Fleet Liquidators from points in Pennsylvania to the facilities of Dupes' Garage, Londonderry Township, Dauphin County, PA.