



# Mullaney Law Offices

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CHRISTOPHER P. MULLANEY  
JUSTIN J. BOEHRET

GERALD J. MULLANEY, SR. (1939-2012)

February 21, 2014

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
PO Box 3265  
Harrisburg, PA 17105-3265

RE: Pennsylvania Public Utility Commission v. Amity Self Storage, Inc.  
Docket No. C-2014-2401880

Dear Secretary Chiavetta:

Please be advised I have been retained to represent the Defendant, Amity Self Storage, Inc. Enclosed please find Defendant's Answer with New Matter with regard to the above-captioned matter.

Very truly yours,

  
CHRISTOPHER P. MULLANEY

CPM/rb  
Enclosure

cc: Amity Self Storage, Inc. (w/encl.)

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Christopher P. Mullaney, Esquire : Attorney for Defendant  
Attorney ID No. 85706 :  
MULLANEY LAW OFFICES :  
598 Main Street, PO Box 24 :  
Red Hill, PA 18076-0024 :  
(215) 679-7931 :

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY : Docket No. C-2014-2401880  
COMMISSION, BUREAU OF :  
INVESTIGATION AND ENFORCEMENT :

v. :

AMITY SELF STORAGE, INC. :  
202 BLACK MATT ROAD :  
DOUGLASSVILLE, PA 19518 :

**DEFENDANT'S ANSWER TO PLAINTIFF'S COMPLAINT**

**AND NOW COMES** the Defendant, Amity Self Storage, Inc., by and through their attorney, Christopher P. Mullaney, Esquire, and hereby responds to Plaintiff's Complaint as follows:

1. Denied as a conclusion of law.
2. Denied. Amity Self Storage, Inc. maintains its principal place of business at 1100 Benjamin Franklin Highway, Douglassville, PA 19518.
3. Admitted upon information and belief.
4. Denied. For as long as Amity Self Storage, Inc. owned the alleged motor carrier, it maintained insurance on file with the Commission.

5. Denied as a conclusion of law to which no response is required.

**WHEREFORE**, Defendant respectfully requests that judgment be entered in favor of Defendant and against Plaintiff and dismiss Plaintiff's Complaint, with prejudice.

**NEW MATTER**

6. Defendant incorporates by reference their responses to the foregoing paragraphs as if the same were fully set forth at length herein.

7. Defendant sold the vehicle in question approximately three (3) years ago. Therefore, a Certificate of Public Convenience is no longer required. A Discontinuance of PA PUC Authority Form is attached hereto, incorporated herein and marked as Exhibit "A".

**WHEREFORE**, Defendant respectfully requests that judgment be entered in favor of Defendant and against Plaintiff and dismiss Plaintiff's Complaint, with prejudice.

Respectfully submitted,

MULLANEY LAW OFFICES

By: 


Christopher P. Mullancy, Esquire  
Attorney for Defendant,  
Amity Self Storage, Inc.

**VERIFICATION**

Christopher P. Mullaney, Esquire, hereby verifies that the statements made in the foregoing document are true and correct to the best of my personal knowledge, information and belief. To the extent that the foregoing contains averments which are inconsistent in fact, I verify that my knowledge or information is sufficient to form a belief that one or more of them is true, although I am currently unable, after reasonable investigation, to ascertain which of the inconsistent averments are true.

This verification is made subject to the penalties of 18 PA C.S.A. §4904 relating to unsworn falsification to authorities.

2/20/14  
DATE

  
\_\_\_\_\_  
Christopher P. Mullaney, Esquire

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# EXHIBIT "A"

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**PENNSYLVANIA PUBLIC UTILITY COMMISSION  
MOTOR CARRIER SERVICES AND ENFORCEMENT**

**To Whom It May Concern:**

**In accordance with the final decision at P-00940884, Regulation of Motor Common Carriers of Property, adopted December 15, 1994 and entered December 20, 1994:**

**I hereby request that my Certificate of Public Convenience issued at A-00 121903, be canceled, and that all rights, powers and privileges conveyed thereby cease and terminate.**

**I understand that my request and subsequent cancellation of the certificate will require the refiling of an application and payment of a filing fee should I decide to again initiate common carrier service.**

Amity Self Storage, Inc.

**CARRIER NAME**

1100 Benjamin Franklin Highway  
Douglassville, PA 19518


**CARRIER ADDRESS**

**AUTHORIZED SIGNATURE**

**PRINT NAME**

**TITLE**

**DATE**

  
Christopher P. McHenry Atty for corp

2-20-14



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