

SCHUBERT ♦ GALLAGHER

LAW OFFICES



TYLER ♦ MULCAHEY

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Richard T. Mulcahey, Jr.  
Also Member of New York Bar  
Direct Dial No.: (215) 587-0107  
e-mail: rmulcahey@sgtmlaw.com

July 7, 2014

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

RECEIVED  
2014 JUL -9 AM 10:40  
PA P.U.C.  
SECRETARY'S BUREAU

**Re: Application of Gentle Giant Moving Company (DC), LLC  
t/d/b/a Gentle Giant Moving and Storage  
PUC Docket No. A-2013-2393811**

Dear Secretary Chiavetta:

Please be advised that this office represents the above-captioned Applicant. By my letter dated June 26, 2014 to you, (a copy of which I enclose for your convenience) I enclosed 20 Verified Statements in Support of the Application filed by my client. In my follow-up letter to you of June 27, 2014 (a copy of which is also enclosed herein) I enclosed two additional Verified Statements requesting that they be included with the previous Verified Statements received by your office.

In our July 3, 2014 mail, I received seven additional Verified Statements and request that they be included with the previous Verified Statements received by your office.

Kindly acknowledge receipt of the enclosures by time-stamping the enclosed copy of this letter and returning to me in the self-addressed, stamped envelope provided.

Respectfully submitted,

Richard T. Mulcahey, Jr.

RTMJR/mac  
Enclosures

cc: Gentle Giant Moving Company (DC), LLC (w/encls. Via E-mail)

**VERIFIED STATEMENT IN SUPPORT OF THE APPLICATION**

THE FOLLOWING INFORMATION IS REQUIRED BY THE COMMISSION TO DETERMINE THAT THERE IS A NEED FOR THE APPLICANT'S SERVICES. STATEMENT SHOULD BE TYPED OR PRINTED.

Joshua Ellis  
Name of Supporter

---

429 Shurs Ln Philadelphia PA 19128  
Street Address City or Municipality State Zip Code

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Gentle Giant Moving & Storage  
Name of Applicant

- Describe the type of transportation service needed.

Household Goods Moving


- What will be the usual origin and destination? Please give specific locations, such as names of cities, boroughs, or townships. 429 Shurs Ln Phila, PA 19128 moving to Lewisburg PA 500 Moores School Rd 17837
- How frequently is this service needed? Example: Is it on a daily, weekly, or monthly basis? Every 3-5 years

- Have you tried to use other providers of service in this area, and if so, why do you prefer not to use them? No, I wish to use Gentle Giant because of their reputation and excellent track record.
- Have you supported similar applications in the past? If so, please supply name and docket number. No

**VERIFICATION OF STATEMENT**

The undersigned deposes and says that he/she is the person who signed the Statement for the above-captioned applicant/application and that he/she is authorized to and does make this verification and that the facts set forth therein are true and correct to the best of his/her knowledge, information, 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.

  
(Signature)

6/30/14  
(Date)

---

Joshua Ellis  
(Name, printed or typed)

SECRETARY'S BUREAU  
PA P.U.C.

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**VERIFIED STATEMENT IN SUPPORT OF THE APPLICATION**

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REBECCA MICHAELS  
Name of Supporter

2001 N. 13TH STREET PHILA PA 19122  
Street Address City or Municipality State Zip Code

Gentle Giant Moving & Storage

Name of Applicant

- Describe the type of transportation service needed.

Household Goods Moving

- What will be the usual origin and destination? Please give specific locations, such as names of cities, boroughs, or townships.

Phila PA - center city

- How frequently is this service needed? Example: Is it on a daily, weekly, or monthly basis?

Every 3-5 yrs

- Have you tried to use other providers of service in this area, and if so, why do you prefer not to use them?

I have heard of Gentle Giant's good reputation and want to ensure that you move with a quality company

- Have you supported similar applications in the past? If so, please supply name and docket number.

No

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Rebecca Michaels  
(Signature)

REBECCA MICHAELS  
(Name, printed or typed)

06.25.2014  
(Date)

2014 JUL -9 AM 10:40

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**VERIFIED STATEMENT IN SUPPORT OF THE APPLICATION**

THE FOLLOWING INFORMATION IS REQUIRED BY THE COMMISSION TO DETERMINE THAT THERE IS A NEED FOR THE APPLICANT'S SERVICES. STATEMENT SHOULD BE TYPED OR PRINTED.

JESSICA KURONEN

Name of Supporter			
2416 CORAL ST	PHILADELPHIA	PA	19125
Street Address	City or Municipality	State	Zip Code

Gentle Giant Moving & Storage			
Name of Applicant			

- Describe the type of transportation service needed.

Household Goods Moving

- What will be the usual origin and destination? Please give specific locations, such as names of cities, boroughs, or townships.

PHILADELPHIA CENTER CITY/NORTH PHILLY SUBURBS

- How frequently is this service needed? Example: Is it on a daily, weekly, or monthly basis?

Every 3-5 yrs

- Have you tried to use other providers of service in this area, and if so, why do you prefer not to use them?

I have heard of Gentle Giant's good reputation and want to ensure that you move with a quality company

- Have you supported similar applications in the past? If so, please supply name and docket number.


No

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 \_\_\_\_\_  
 (Signature)  
 JESSICA KURONEN  
 \_\_\_\_\_  
 (Name, printed or typed)

6.25.14  
 \_\_\_\_\_  
 (Date)

## VERIFIED STATEMENT IN SUPPORT OF THE APPLICATION

THE FOLLOWING INFORMATION IS REQUIRED BY THE COMMISSION TO DETERMINE THAT THERE IS A NEED FOR THE APPLICANT'S SERVICES. STATEMENT SHOULD BE TYPED OR PRINTED.

NATASSIA KURONEN

Name of Supporter

1627 DIAMOND ST

Street Address

PHILADELPHIA

City or Municipality

PA

State

19121

Zip Code

Gentle Giant Moving & Storage

Name of Applicant

- Describe the type of transportation service needed.

Household Goods Moving

- What will be the usual origin and destination? Please give specific locations, such as names of cities, boroughs, or townships.

North Philly

- How frequently is this service needed? Example: Is it on a daily, weekly, or monthly basis?

Every 3-5 yrs

- Have you tried to use other providers of service in this area, and if so, why do you prefer not to use them?

I have heard of Gentle Giant's good reputation and want to ensure that you move with a quality company

- Have you supported similar applications in the past? If so, please supply name and docket number.

No

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SECRETARY'S OFFICE

## **VERIFICATION OF STATEMENT**

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Natassia Kuronen

(Signature)

NATASSIA KURONEN

(Name, printed or typed)

06.25.2014

(Date)

**VERIFIED STATEMENT IN SUPPORT OF THE APPLICATION**

THE FOLLOWING INFORMATION IS REQUIRED BY THE COMMISSION TO DETERMINE THAT THERE IS A NEED FOR THE APPLICANT'S SERVICES. STATEMENT SHOULD BE TYPED OR PRINTED.

ALEXANDRA RUANE  
Name of Supporter  
2346 N. PARK AVE PHILA PA 19122  
Street Address City or Municipality State Zip Code  
Gentle Giant Moving & Storage  
Name of Applicant

- Describe the type of transportation service needed.

Household Goods Moving

- What will be the usual origin and destination? Please give specific locations, such as names of cities, boroughs, or townships.

TEMPLETON

- How frequently is this service needed? Example: Is it on a daily, weekly, or monthly basis?

Every 3-5 yrs

- Have you tried to use other providers of service in this area, and if so, why do you prefer not to use them?

I have heard of Gentle Giant's good reputation and want to ensure that you move with a quality company

- Have you supported similar applications in the past? If so, please supply name and docket number.

No

**VERIFICATION OF STATEMENT**

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Alexandra Ruane  
(Signature)  
ALEXANDRA RUANE  
(Name, printed or typed)

6/26/14  
(Date)

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2014 JUL -9 AM 10:00  
PA P.U.C.  
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**VERIFIED STATEMENT IN SUPPORT OF THE APPLICATION**

THE FOLLOWING INFORMATION IS REQUIRED BY THE COMMISSION TO DETERMINE THAT THERE IS A NEED FOR THE APPLICANT'S SERVICES. STATEMENT SHOULD BE TYPED OR PRINTED.

SAMANTHA MITCHELL  
Name of Supporter

2837 CAMBRIDGE ST PHILADELPHIA PA 19130  
Street Address City or Municipality State Zip Code

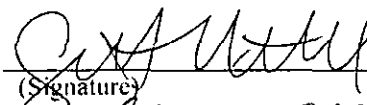
GENTLE GIANT MOVERS MOVING & STORAGE  
Name of Applicant

- Describe the type of transportation service needed.  
I NEED HELP MOVING HOUSE HOLD GOODS
- What will be the usual origin and destination? Please give specific locations, such as names of cities, boroughs, or townships.  
IN PHILADELPHIA, FROM BREWERTOWN TO FAIRMOUNT
- How frequently is this service needed? Example: Is it on a daily, weekly, or monthly basis?  
~~MONTHLY~~ EVERY FEW YEARS
- Have you tried to use other providers of service in this area, and if so, why do you prefer not to use them?  
YES, HAVE USED UHAUL & PREFER PROFESSIONALS
- Have you supported similar applications, in the past? If so, please supply name and docket number.  
NO

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(Signature)  
SAMANTHA MITCHELL  
(Name, printed or typed)

6/24/14  
(Date)

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2014 JUL -9 AM 10:10  
PA. EDUC. SECRETARY'S OFFICE

**VERIFIED STATEMENT IN SUPPORT OF THE APPLICATION**

THE FOLLOWING INFORMATION IS REQUIRED BY THE COMMISSION TO DETERMINE THAT THERE IS A NEED FOR THE APPLICANT'S SERVICES. STATEMENT SHOULD BE TYPED OR PRINTED.

SAM NEWHOUSE

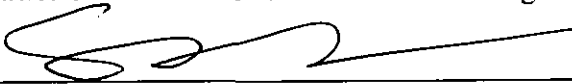
Name of Supporter			
419 S. 44 <sup>th</sup> St. #2	PHILADELPHIA	PA	19104
Street Address	City or Municipality	State	Zip Code
Name of Applicant			
GENTLE GIANT MOVING COMPANY			

- Describe the type of transportation service needed.  
I NEED assistance moving my possessions + furniture to my new residence later this summer.
- What will be the usual origin and destination? Please give specific locations, such as names of cities, boroughs, or townships.  
I am planning soon to move from West Philly (44<sup>th</sup> + Osage) to Nicetown (28<sup>th</sup> + Cambridge), also in Philly.
- How frequently is this service needed? Example: Is it on a daily, weekly, or monthly basis?  
This would be a one-time need this year, possibly needed again next year.
- Have you tried to use other providers of service in this area, and if so, why do you prefer not to use them?  
I hired movers here but they could not provide a truck + only had two men, it took 3 hours + my girlfriend + I had to move a lot of the boxes myself, drive the truck + pay these expenses.
- Have you supported similar applications in the past? If so, please supply name and docket number.  
No.

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	PA P.U.C. SECRETARY'S BUREAU	6/16/14
(Signature)		(Date)
SAM NEWHOUSE	2014 JUL -9 AM 10:40	
(Name, printed or typed)		

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**INSTRUCTIONS FOR OBTAINING  
VERIFIED STATEMENTS IN SUPPORT OF THE APPLICATION**

The attached form is for documenting witness statements demonstrating the need for the proposed service. This form may be duplicated as needed for use by supporting witnesses.

In accordance with 52 Pa. Code §41.14(a) “An applicant seeking motor common carrier authority has a burden of demonstrating that approval of the application will serve a useful public purpose, responsive to a public demand or need.”

Accordingly, verified witness statements provide a means for demonstrating such a public demand or need.

Please be aware that the verified statements will be reviewed based upon the Commission’s decision *Application of Blue Bird Coach Lines, Inc. (A-00088807, F.2, Am-K) 72 Pa. PUC 262 (1990)* which indicates:

- (1) the supporting witnesses must give evidence which is probative and relevant to the application proceeding
- (2) the supporting witnesses must identify Pennsylvania origin and destination points between which they require transportation and those points must correspond with the scope of the operating territory specified in the application, including request for vice versa authority
- (3) the number of witnesses which will represent a cross section of the public on the issue of need will vary with the breadth of the intended territory and commodity description

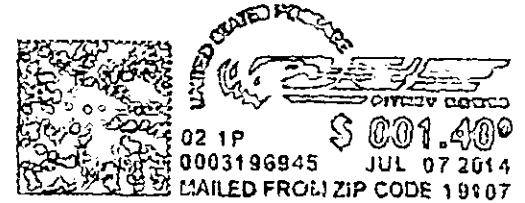
*Also see 52 Pa. Code §3.381(c)(1)(3)(A)*

The following form may be used to obtain witness statements in support of your application. Failure to demonstrate a public need will result in dismissal of your application. Failure to obtain evidence from a cross section of the public may result in the Commission granting limited authority consistent with the need demonstrated by the applicant.

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2014 JUL -9 AM 10:42

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LAW OFFICES  
**SCHUBERT ♦ GALLAGHER**  **TYLER ♦ MULCAHEY**  
121 SOUTH BROAD STREET, 20TH FLOOR PHILADELPHIA, PA 19107-4533

**TO:**

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