

SCHUBERT ♦ GALLAGHER

LAW OFFICES



TYLER ♦ MULCAHEY

121 SOUTH BROAD STREET, 20TH FLOOR
PHILADELPHIA, PA 19107-4533

PHONE: 215.569.3535
FAX: 215.557.7426
WWW.SGTMLAW.COM

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

September 10, 2014

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

RECEIVED
24 SEP 15 AM 11:15
PENNSYLVANIA
SECRETARY'S BUREAU

**Re: Application of Kris Eckerl, t/a Michaels Moving and Storage
PUC Docket No.: A-2014-2429336 (Corrected)**

Dear Ms. Chiavetta:

Please be advised that this office represents Cadden Bros. Moving & Storage, Inc. Accordingly, I enclose herewith an original Protest of our client to the above captioned Application.

Kindly acknowledge receipt of the enclosure 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: Kris Eckerl, t/a Michaels Moving and Storage (w/encls.)
Cadden Bros. Moving & Storage, Inc. (w/encls.)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

IN RE: APPLICATION OF : PUC DOCKET NO.:
 KRIS ECKERL, T/A MICHAELS : A-2014-2429336 (CORRECTED)
 MOVING AND STORAGE

PROTEST

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

AND NOW, comes Cadden Bros. Moving & Storage, Inc. ("Protestant"), by its attorneys, Richard T. Mulcahey, Jr. of Schubert, Gallagher, Tyler & Mulcahey, and files this Protest to the instant Application and respectfully represents that:

1. The name, address and telephone number of the Protestant are:

Cadden Bros. Moving & Storage, Inc.
1106 Mid Valley Drive
Olyphant, PA 187447
(570) 489-4005

2. The name, address and telephone number of the Protestant's attorneys are:

Richard T. Mulcahey, Jr., Esquire
Schubert, Gallagher, Tyler & Mulcahey
121 South Broad Street, 20th Floor
Philadelphia, PA 19107-4533
(215) 587-0107

3. Protestant is certificated by Your Honorable Commission at Application Docket No. A-00123871. A copy of the relevant portions of the Protestant's authority upon which its Protest is herein predicated is attached hereto as Exhibit "A" and incorporated by reference herein.

4. Applicant does not possess the technical and financial ability to provide the proposed service and lacks a propensity to operate safely and legally and, therefore, does not have the fitness to be granted a Certificate of Public Convenience by Your Honorable Commission.

RECEIVED
2014 SEP 15 AM 11:16
PA P.U.C.
SECRETARY'S BUREAU

5. Approval of the Application would create new and unwarranted competition to the detriment of Protestant and other existing carriers and ultimately the public, tending to deprive Protestant and other carriers of customers and to divert revenues which are essential to the maintenance of an adequate transportation system responsive to the needs of the public.

6. Approval of the Application would be contrary to the accommodation, convenience, service and safety of the public because Protestant and other carriers are providing adequate service to the public in the areas involved in the Application.

7. Protestant will consider withdrawing its Protest in the event Applicant agrees not to provide service in the geographic area which is included in Protestant's Certificate of Public Convenience.

Respectfully submitted,

By: 
RICHARD T. MULCAHEY, JR.
SCHUBERT, GALLAGHER,
TYLER & MULCAHEY
Attorneys for Protestant

Cadden Bros. Moving & Storage, Inc.
PUC Docket No. A-00123871

EXHIBIT "A"

CERTIFICATE OF SERVICE

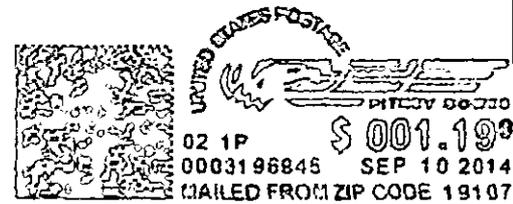
I, Mary Anne Cranage, hereby certify that on September 10, 2014, I forwarded by first-class mail, postage pre-paid, a copy of the Protest filed on behalf of Cadden Bros. Moving & Storage, Inc. to Applicant, Kris Eckerl, t/a Michaels Moving and Storage at 126 Snowshoe Drive, Dingmans Ferry, PA 18328.

DATE: September 10, 2014



MARY ANNE CRANAGE

RECEIVED
2014 SEP 15 AM 11:16
PA P.U.C.
SECRETARY'S BUREAU



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

SECRETARY'S BUREAU
PA 200

2014 SEP 15 AM 11:16

RECEIVED