

SCHUBERT, BELLWOAR, MALLON & WALHEIM

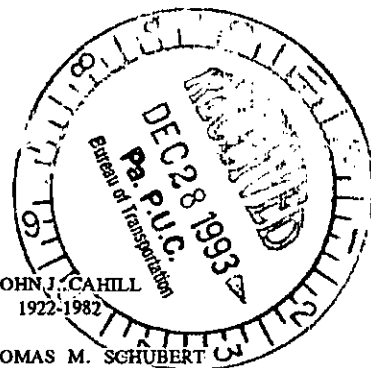
ATTORNEYS AT LAW
TWO PENN CENTER PLAZA, SUITE 1400
1500 JOHN F. KENNEDY BOULEVARD
PHILADELPHIA, PA 19102-1890

(215) 569-3535
FAX: (215) 557-7426

DIRECT-DIAL NO.
(215) 587-0107

WILLIAM E. SCHUBERT, JR.
HARRY J.J. BELLWOAR III *†
JOHN P. QUINN
JOHN J. CAHILL, JR.
ROBERT T. LYNCH
JOSEPH A. WALHEIM
ROBERT G. BELLWOAR
WILLIAM F. SWEENEY *
JOHN P. GALLAGHER
DEBORAH E. KOLODNER *
RICHARD T. MULCAHEY, JR.
JAMES M. TYLER *
CHARLES E. MOSCONY, JR. *

OF COUNSEL
JOSEPH G. DENNY III



JOHN J. CAHILL
1922-1982

THOMAS M. SCHUBERT
1951-1989



NEW JERSEY OFFICE
311 W. CUTHBERT BOULEVARD
HADDON TOWNSHIP, NJ 08108

* ALSO MEMBER OF
NEW JERSEY BAR
† MANAGING ATTORNEY
FOR NEW JERSEY

ALL OTHERS MEMBERS OF
PENNSYLVANIA BAR ONLY

December 23, 1993

John G. Alford, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105

Re: Application of James Danielewicz,
t/d/b/a Limousines for Less
PUC Docket No. A-00108292, F.1, Am-A

Dear Mr. Alford:

Please be advised that this office represents J & J Leasing & Rentals, Inc., t/d/b/a J & J Limousine Service, Protestant to the above-captioned Application.

On behalf of our client, we are enclosing herein Protest to the instant Application. A copy of the same has been forwarded this date to Applicant.

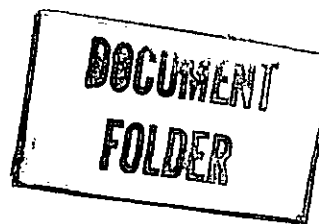
Kindly acknowledge receipt of the enclosure by time-stamping a copy of this letter and returning it to the undersigned in the enclosed, self-addressed, stamped envelope provided.

Sincerely,

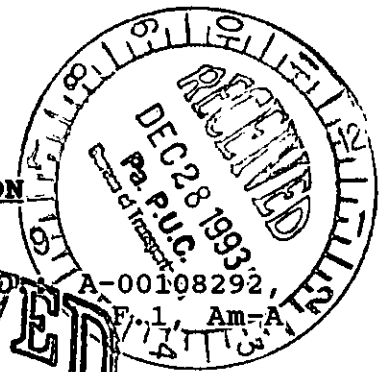
RICHARD T. MULCAHEY, JR.

RTM/sew
Enclosure

cc: James D. Campbell, Jr., Esquire
J & J Leasing & Rentals, Inc.



BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION



IN RE: APPLICATION OF :
JAMES DANIELEWICZ,
T/D/B/A LIMOUSINES
FOR LESS

PUC DOCKET NO. A-00108292
RECEIVED
DEC 27 1993
F. 1, Am-A

PROTEST

SECRETARY'S OFFICE
Public Utility Commission

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

AND NOW, comes J & J Leasing & Rentals, Inc., t/d/b/a J & J Limousine Service ("Protestant"), by its attorneys, Richard T. Mulcahey, Jr., Schubert, Bellwoar, Mallon & Walheim, and files this Protest to the instant Application and respectfully represents that:

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

J & J Leasing & Rentals, Inc.,
t/d/b/a J & J Limousine Service
1313 Hanover Avenue
Allentown, PA 18103
(215) 776-1516

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

Richard T. Mulcahey, Jr., Esquire
Schubert, Bellwoar, Mallon & Walheim
1400 Two Penn Center Plaza
Philadelphia, PA 19102
(215) 587-0107

3. Protestant is certificated by Your Honorable Commission at Application Docket No. 00105282. A copy of the relevant portions of the Protestant's authority upon which its Protest is

**DOCUMENT
FOLDER**

DOCKETED
APPLICATION DOCKET
DEC 28 1993
ENTRY No. M


4. Applicant has not demonstrated his fitness to be granted a Certificate of Public Convenience by Your Honorable Commission.

5. Approval of the Application would create new and unwarranted competition to the detriment of Protestant and ultimately the public, tending to deprive Protestant of customers and to divert revenues from it 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.

7. At the present time, there is no amendment to which the Protestant is agreeable or would result in the withdrawal of the Protest.

Respectfully submitted,

By: 
RICHARD T. MULCAHEY, JR.
SCHUBERT, BELLWOAR, MALLON
& WALHEIM
Attorneys for Protestant

**J & J Leasing & Rentals, Inc.,
t/d/b/a J & J Limousine Service**

To transport, as a common carrier, by motor vehicles, persons, in limousine service, in the Counties of Lehigh and Northampton, and from said Counties to points in Pennsylvania and return.

To transport, as a common carrier, persons, in limousine service, between points in the Counties of Carbon, Luzerne and Monroe, and from points in said Counties to points in Pennsylvania and return;

subject to the following condition:

That service from points in Monroe County shall be limited to transportation for Ray Starner, Shearson/Lehman Brothers, James J. Bickel and Advantage Cellular, Inc.

CERTIFICATE OF SERVICE

I, Shaune E. Whaley, hereby certify that on December 23, 1993, I forwarded by first-class mail, postage pre-paid, a copy of the Protest filed on behalf of J & J Leasing & Rentals, Inc., t/d/b/a J & J Limousine Service, to Applicant, James Danielewicz, t/d/b/a Limousines for Less, 315 Clermont Avenue, Stroudsburg, PA 18360, and attorney for Applicant, James D. Campbell, Jr., Esquire, 3631 North Front Street, Harrisburg, PA 17110.

DATE: December 23, 1993


SHAUNE E. WHALEY

December 17, 1993

RECEIVED

James D. Campbell, Jr.
Attorney at Law
3632 North Front Street
Harrisburg, PA 17110

In re: Application of - A-00108292, F.l, Am-A - James Danielewicz, t/d/b/a
Limousines for Less

Dear Sir:

The application of James Danielewicz, t/d/b/a Limousines for Less
has been captioned as attached and will be submitted for review provided no
protests are filed on or before January 10, 1994. If protests are filed, you
will be advised as to further procedure.

You are further advised that the above application will be
published in the Pennsylvania Bulletin of December 18, 1993.

Very truly yours,

David Ehrhart
Supervisor - Application Section
Bureau of Transportation

DE:de

cc: Applicant
315 Clermont Avenue
Stroudsburg, PA 18360

<p>DOCKETED APPLICATION DOCKET DEC 17 1993 ENTRY No. <i>202</i></p>	<p>DOCUMENT FOLDER</p>
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- A-00108292, Folder 1, Am-A JAMES DANIELEWICZ, t/d/b/a LIMOUSINES FOR LESS (315 Clermont Avenue, Stroudsburg, Monroe County, PA 18360) - persons, in limousine service, from points in the borough of Stroudsburg, Monroe County, Pennsylvania, and from points within an airline distance of ten (10) statute miles of the limits of the said Borough of Stroudsburg, to the Allentown/Bethlehem/Easton Airport, and vice versa: SO AS TO PERMIT the transportation of persons, in limousine service, between points in the counties of Monroe and Pike, and from points in said counties, to points within an airline distance of fifty (50) statute miles of the limits thereof, and vice versa. ATTORNEY: James D. Campbell, Jr., 3631 North Front Street, Harrisburg, PA 17110.

SCHUBERT, BELLWOAR, MALLON & WALHEIM

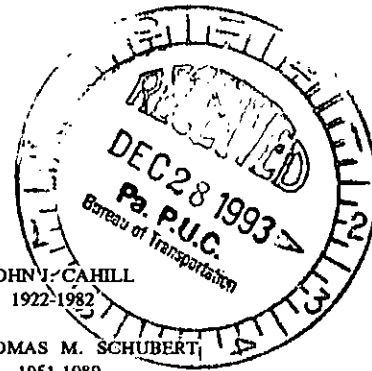
ATTORNEYS AT LAW
TWO PENN CENTER PLAZA, SUITE 1400
1500 JOHN F. KENNEDY BOULEVARD
PHILADELPHIA, PA 19102-1890

(215) 569-3535
FAX: (215) 557-7426

DIRECT-DIAL NO.
(215) 587-0107

WILLIAM E. SCHUBERT, JR.
HARRY J.J. BELLWOAR III †
JOHN P. QUINN
JOHN J. CAHILL, JR.
ROBERT T. LYNCH
JOSEPH A. WALHEIM
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DEBORAH E. KOLODNER *
RICHARD T. MULCAHEY, JR.
JAMES M. TYLER *
CHARLES E. MOSCONY, JR. *

OF COUNSEL
JOSEPH G. DENNY III



JOHN J. CAHILL
1922-1982
THOMAS M. SCHUBERT
1951-1989

NEW JERSEY OFFICE
311 W. CUTHBERT BOULEVARD
HADDON TOWNSHIP, NJ 08108

* ALSO MEMBER OF
NEW JERSEY BAR
† MANAGING ATTORNEY
FOR NEW JERSEY

ALL OTHERS MEMBERS OF
PENNSYLVANIA BAR ONLY

December 23, 1993

John G. Alford, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105

Re: Application of James Danielewicz,
t/d/b/a Limousines for Less
PUC Docket No. A-00108292, F.1, Am-A



SECRETARY'S OFFICE
Public Utility Commission

Dear Mr. Alford:

Please be advised that this office represents LoMa, Inc., t/d/b/a A.B.E. Limo & Bus Service, t/d/b/a AERO Chauffeured Limo & Mini Bus Svc., Protestant to the above-captioned Application.

On behalf of our client, we are enclosing herein Protest to the instant Application. A copy of the same has been forwarded this date to Applicant.

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

Sincerely,

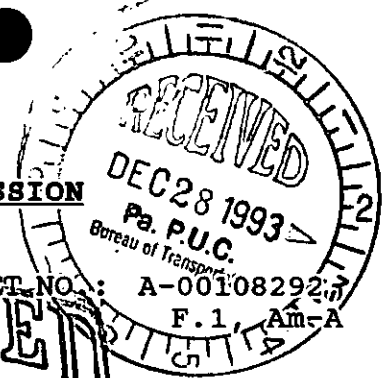
RICHARD T. MULCAHEY, JR.

RTM/sew
Enclosures

cc: James D. Campbell, Jr., Esquire
LoMa, Inc.



BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION



IN RE: APPLICATION OF
JAMES DANIELEWICZ,
T/D/B/A LIMOUSINES
FOR LESS

PUC-DOCKET NO.: A-00108292

RECEIVED
DEC 27 1993

PROTEST

SECRETARY'S OFFICE
Public Utility Commission

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

AND NOW, comes LoMa, Inc., t/d/b/a A.B.E. Limo & Bus Service, t/d/b/a AERO Chauffeured Limo & Mini Bus Svc. ("Protestant"), by its attorneys, Richard T. Mulcahey, Jr., Schubert, Bellwoar, Mallon & Walheim, and files this Protest to the instant Application and respectfully represents that:

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

LoMa, Inc., t/d/b/a A.B.E. Limo & Bus Service,
t/d/b/a AERO Chauffeured Limo & Mini Bus Svc.
401 North Front Street
Building #2-R
Allentown, PA 18102
(215) 821-9303

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

Richard T. Mulcahey, Jr., Esquire
Schubert, Bellwoar, Mallon & Walheim
1400 Two Penn Center Plaza
Philadelphia, PA 19102
(215) 587-0107

3. Protestant is certificated by Your Honorable Commission at Application Docket No. 00104134. 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.

DOCUMENT
FOLDER

DOCKETED
APPLICATION DOCKET
DEC 28 1993
ENTRY No.


4. Applicant has not demonstrated his fitness to be granted a Certificate of Public Convenience by Your Honorable Commission.

5. Approval of the Application would create new and unwarranted competition to the detriment of Protestant and ultimately the public, tending to deprive Protestant of customers and to divert revenues from it 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.

7. At the present time, there is no amendment to which the Protestant is agreeable or would result in the withdrawal of the Protest.

Respectfully submitted,

By: 
RICHARD T. MULCAHEY, JR.
SCHUBERT, BELLWOAR, MALLON
& WALHEIM
Attorneys for Protestant

LoMa, Inc.,
t/d/b/a A.B.E. Limo & Bus Service,
t/d/b/a AERO Chauffeured Limo & Mini Bus Svc.

To transport, as a common carrier,
persons in limousine service,
between points in the Counties of
Lehigh and Northampton, and from
points in said territory to points
in Pennsylvania, and vice versa.

EXHIBIT "A"

CERTIFICATE OF SERVICE

I, Shaune E. Whaley, hereby certify that on December 23, 1993, I forwarded by first-class mail, postage pre-paid, a copy of the Protest filed on behalf of LoMa, Inc., t/d/b/a A.B.E. Limo & Bus Service, t/d/b/a AERO Chauffeured Limo & Mini Bus Svc., to Applicant, James Danielewicz, t/d/b/a Limousines for Less, 315 Clermont Avenue, Stroudsburg, PA 18360, and attorney for Applicant, James D. Campbell, Jr., Esquire, 3631 North Front Street Harrisburg, PA 17110.

DATE: December 23, 1993


SHAUNE E. WHALEY

SCHUBERT, BELLWOAR, MALLON & WALHEIM

ATTORNEYS AT LAW

TWO PENN CENTER PLAZA, SUITE 1400
1500 JOHN F. KENNEDY BOULEVARD
PHILADELPHIA, PA 19102-1890

(215) 569-3535

FAX: (215) 557-7426

WILLIAM E. SCHUBERT, JR.
HARRY J.J. BELLWOAR III *†
JOHN P. QUINN
JOHN J. CAHILL, JR.
ROBERT T. LYNCH
JOSEPH A. WALHEIM
ROBERT G. BELLWOAR
WILLIAM F. SWEENEY *
JOHN P. GALLAGHER
DEBORAH E. KOLODNER *
RICHARD T. MULCAHEY, JR.
JAMES M. TYLER *
CHARLES E. MOSCONY, JR. *

DIRECT-DIAL NO.
(215) 587-0107

JOHN J. CAHILL
1922-1982

THOMAS M. SCHUBERT
1951-1989

NEW JERSEY OFFICE
311 W. CUTHBERT BOULEVARD
HADDON TOWNSHIP, NJ 08108

* ALSO MEMBER OF
NEW JERSEY BAR
† MANAGING ATTORNEY
FOR NEW JERSEY

ALL OTHERS MEMBERS OF
PENNSYLVANIA BAR ONLY

OF COUNSEL
JOSEPH G. DENNY III

December 23, 1993

John G. Alford, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105

RECEIVED
DEC 28 1993

Re: Application of James Danielewicz,
t/d/b/a Limousines for Less
PUC Docket No. A-00108292, F.1, Am-A

SECRETARY'S OFFICE
Public Utility Commission

Dear Mr. Alford:


Please be advised that this office represents Corporate Livery, Inc., Protestant to the above-captioned Application.

On behalf of our client, we are enclosing herein Protest to the instant Application. A copy of the same has been forwarded this date to Applicant.

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

RECEIVED
3 DEC 29 AM 11:22
PA PUC
BUREAU OF
TRANSPORTATION

Sincerely,



RICHARD T. MULCAHEY, JR.

RTM/sew
Enclosures

cc: James D. Campbell, Jr., Esquire
Corporate Livery, Inc.

**DOCUMENT
FOLDER**

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

IN RE: APPLICATION OF
JAMES DANIELEWICZ,
T/D/B/A LIMOUSINES
FOR LESS

PUC DOCKET NO. A-00108292,
Am-A

RECEIVED
DEC 28 1993

PROTEST

SECRETARY'S OFFICE
Public Utility Commission

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

AND NOW, comes Corporate Livery, Inc., by its attorneys, Richard T. Mulcahey, Jr., Schubert, Bellwoar, Mallon & Walheim, and files this Protest to the instant Application and respectfully represents that:

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

Corporate Livery, Inc.
P.O. Box 545
Allentown, PA 18105
(215) 435-1441

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

Richard T. Mulcahey, Jr., Esquire
Schubert, Bellwoar, Mallon & Walheim
1400 Two Penn Center Plaza
Philadelphia, PA 19102
(215) 587-0107

3. Protestant is certificated by Your Honorable Commission at Application Docket No. A-00110212, F.2. A copy of the relevant portions of the Protestant's authorities upon which its Protest is herein predicated is attached hereto as Exhibit "A" and incorporated by reference herein.

**DOCUMENT
FOLDER**

DOCKETED
APPLICATION DOCKET
DEC 29 1993
ENTRY No. 11

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DEC 29 AM 8:52
PA PUC
BUREAU OF
TRANSPORTATION

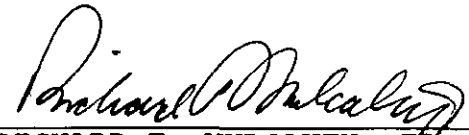
4. Applicant has not demonstrated his fitness to be granted a Certificate of Public Convenience by Your Honorable Commission.

5. Approval of the Application would create new and unwarranted competition to the detriment of Protestant and ultimately the public, tending to deprive Protestant of customers and to divert revenues from it 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.

7. At the present time, there is no amendment to which the Protestant is agreeable or would result in the withdrawal of the Protest.

Respectfully submitted,

By: 
RICHARD T. MULCAHEY, JR.
SCHUBERT, BELLWOAR, MALLON
& WALHEIM
Attorneys for Protestant

CORPORATE LIVERY, INC.
PUC DOCKET NO. A-00110212, F.2

To transport, as a common carrier, persons in limousine service, in Cadillac or Lincoln vehicles, having a seating capacity of seven (7) passengers or less, excluding the driver, between points in the city of Allentown, Lehigh County, and within an airline distance of seventy-five (75) statute miles of the limits of said city;

subject to the following condition:

That no right, power or privilege is granted to provide service between points in Monroe County.

EXHIBIT "A"

CERTIFICATE OF SERVICE

I, Shaune E. Whaley, hereby certify that on December 23, 1993, I forwarded by first-class mail, postage pre-paid, a copy of the Protest filed on behalf of Corporate Livery, Inc. to Applicant, James Danielewicz, t/d/b/a Limousines for Less, 315 Clermont Avenue, Stroudsburg, PA 18360, and attorney for Applicant, James D. Campbell, Jr., Esquire, 3631 North Front Street, Harrisburg, PA 17110.

DATE: December 23, 1993


SHAUNE E. WHALEY

ORIGINAL

RECEIVED
JOSEPH P. HANYON

ATTORNEY AT LAW

MOUNT POCONO PROFESSIONAL CENTRE
FOUR FORK STREET, SUITE 2030
MOUNT POCONO, PA 18344

PA PUC
BUREAU OF
TRANSPORTATION

A-10 P2 92

PHONE: (717) 839-8050
FAX: (717) 839-6723

January 10, 1994

RECEIVED
JAN 12 1994

CERTIFIED MAIL, RRR

SECRETARY'S OFFICE
Public Utility Commission

Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-2265

James D. Campbell, Jr., Esq.
8631 North Front Street
Harrisburg, PA 17110

fat

Re: Protest of Pocono Limousine Services, Inc.

Ladies and Gentlemen:

Please be advised that my office represents Pocono Limousine Services, Inc. Enclosed for filing please find a Protest of Pocono Limousine Service, Inc.

Thank you for your attention.

Very truly yours,

[Handwritten signature]
Joseph P. Hanyon
JPH/js

Joseph P. Hanyon

JPH/js

Encls.

cc: Pocono Limousine Services, Inc.
(w/encls.)

DOCUMENT
FOLDER

RECEIVED

96 JAN 13 AM 8:46

PA PUC
BUREAU OF
TRANSPORTATION

JAN 12 1994

SECRETARY'S OFFICE
Public Utility Commission

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN RE:

JAMES DANIELEWICZ, t/d/b/a

LIMOUSINES FOR LESS

PROTEST ON BEHALF OF POCONO LIMOUSINE SERVICE, INC.

DOCUMENT
FOLDER

DOCKETED

APPLICATION DOCKET
JAN 13 1994

ENTRY No.

Joseph P. Hanyon, Esq.
4 Fork Street, Suite 2030
Mt. Pocono, PA 18344
(717) 839-8050

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN RE:

APPLICATION OF

JAMES DANIELEWICZ, t/d/b/a

LIMOUSINES FOR LESS

PROTEST OF POCONO LIMOUSINE SERVICE, INC.

AND NOW, comes Pocono Limousine Service, Inc. by and through its attorney, Joseph P. Hanyon, Esq., and protests this application representing as follows:

1. The name, business address and telephone number of protestant is: Pocono Limousine Service, Inc., P.O. Box 340, Mount Pocono, Pennsylvania 18344, (717) 839-2111.

2. The name, business address and telephone number of the protestant's attorney is: Joseph P. Hanyon, Esq., Mount Pocono Professional Centre, Four Fork Street, Suite 2030, Mount Pocono, Pennsylvania 18344, (717) 839-8050.

3. The authority sought by applicant is attached as Appendix "A".

4. The protestant possesses authority under Commission Docket No. A-00103841. A copy of said pertinent authority is attached hereto as Appendix "B".

5. The application will become competitive with and detrimental to existing service of Pocono Limousine Service, Inc.

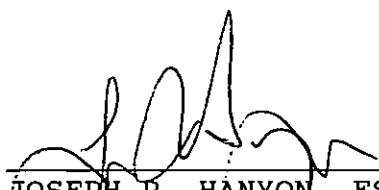
Protestant owns or has access to a full range of equipment for limousine services inter alia, within the certified areas sought by applicant, has satisfactory maintenance facilities, skilled and experienced drivers and other employees.

6. Attached hereto as Appendix "C" is a suggested restrictive amendment which, if accepted by the Commission, will result in the withdrawal of the protest of the above named carrier.

7. Protestant performs services within the scope of its present authority. The diversion of revenues presently being enjoyed by Protestant, would be detrimental to and destructive of the public interest. Approval of this application is not necessary or proper for the service, accommodation, convenience or safety of the public in view of the existing and adequate services of Protestant and other carriers.

8. This protest also goes to applicant's fitness.

WHEREFORE, Pocono Limousine Service, Inc. prays that this application be dismissed.



JOSEPH P. HANYON, ESQUIRE
Attorney for Protestant
Attorney ID # 60337
Mt. Pocono Professional Centre
Four Fork Street, Suite 2030
Mt. Pocono, PA 18344
(717) 839-8050

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document upon the applicant, James Danielewicz t/d/b/a Limousines for Less, at 315 Clearmont Avenue, Stroudsburg, Pennsylvania 18360, and upon applicant's attorney, James D.Campbell, Jr., at 8631 North Front Street, Harrisburg, Pennsylvania 17110, by United States mail, first class, postage prepaid.

Dated: January 10, 1994



JOSEPH P. HANYON, ESQ.

PENNSYLVANIA BULLETIN, VOL. 23, No. 51, December 18, 1993

"A-00108292, Folder 1. Am-A., James Danielewicz, t/d/b/a Limousines for Less (315 Clermont Avenue, Stroudsburg, Monroe County, PA 18360) - persons, in limousine service, from points in the borough of Stroudsburg, Monroe County, Pennsylvania, and from points within an airline distance of 10 statute miles of the limits of the said Borough of Stroudsburg, to the Allentown/Bethlehem/ Easton Airport, and vice versa; so as to permit the transportation of persons, in limousine service, between points in the counties of Monroe and Pike, and from points in said counties, to points within an airline distance of 50 statute miles of the limits thereof, and vice versa, Attorney, James D. Campbell, Jr. 3631 North Front Street, Harrisburg, PA 17110."

APPENDIX "A"

To transport, as a common carrier, by motor vehicle, persons, in luxury limousine service, in vehicles with a seating capacity of ten (10) passengers or less, excluding the driver, between points in the country of Monroe, and within an airline distance of five (5) statute miles of the limits thereof, and from points in said territory, to points in Pennsylvania, and vice versa.

To transport, as a common carrier, by motor vehicle, persons, in airport transfer service, from points in the County of Monroe, and within an airline distance of ten (10) statute miles of the limits thereof, to airport facilities within the said territory, and from points in said territory, to the Wilkes-Barre/Scranton Airport, located in the Township of Pittston, Luzerne County, the Allentown-Bethlehem-Easton Airport, located in the Township of Hanover, Lehigh County, and the Philadelphia International Airport located in the City and County of Philadelphia and the Township of Tinicum, Delaware County, and vice versa.

APPENDIX "B"

PROPOSED RESTRICTIVE AMENDMENT

At present there is not a restrictive amendment that Protestant knows of that will satisfy Protestant's protest.

APPENDIX "C"

CERTIFICATE OF SERVICE

A-00108292
FOONAMA

I, Joan Sorrentino, hereby certify that service of the foregoing Protest of Pocono Limousine Service, Inc. was made upon the following person(s) at the address(es) listed below, by mailing, first class, postage paid, a true copy in the depository of the United States Postal Service, via Certified Mail, Return Receipt Requested.

Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-2265

James D. Campbell, Jr., Esq.
8631 North Front Street
Harrisburg, PA 17110

Dated: January 10, 1994

Joan Sorrentino

JOAN SORRENTINO

DOCUMENT
FOLDER

SOCKETED
FEB 23 1994

CALDWELL & KEARNS

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

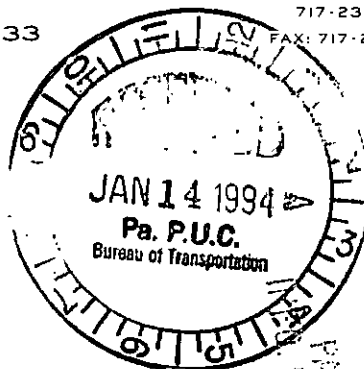
3631 NORTH FRONT STREET
HARRISBURG, PENNSYLVANIA 17110-1533

THOMAS D. CALDWELL, JR.
RICHARD L. KEARNS
CARL G. WASS
JAMES R. CLIPPINGER
CHARLES J. DEHART, III
JAMES D. CAMPBELL, JR.
JAMES L. GOLDSMITH
TIMOTHY I. MARK
JAMES G. NEALON, III
MATTHEW R. GOVER
DEBORAH A. CAVACINI
TIMOTHY W. ROMBERGER

717-232-7661

FAX: 717-232-2766

January 13, 1994



94 JAN 13 PM 1:51

RECEIVED

John G. Alford, Secretary
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

Re: Application of James Danielwicz
A-00108292, F.1, Am-A

Dear Secretary Alford:

Please find enclosed herewith the original and two copies of a Motion to Dismiss Protest in connection with the above application.

Sincerely,

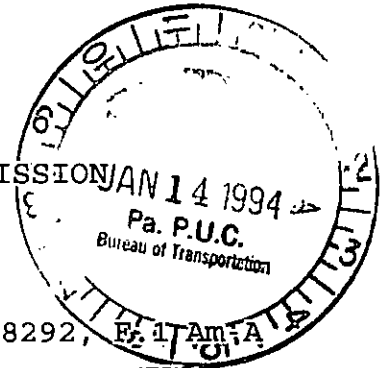
James D. Campbell, Jr.
CALDWELL & KEARNS

JDCJr/kjm
Enclosure
cc: Joseph P. Hanyon, Esquire

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INFO. CONTROL DIV.

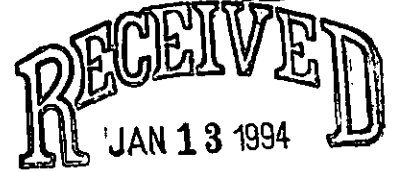


BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION



APPLICATION OF JAMES DANIELEWICZ
t/d/b/a LIMOUSINES FOR LESS

DOCKET NO. A-00108292, Ex. 1, Am. A



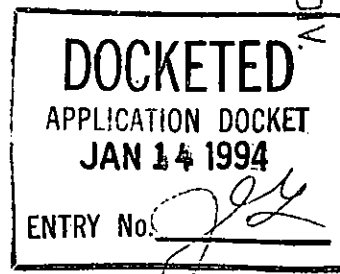
MOTION TO DISMISS PROTEST

SECRETARY'S OFFICE
Public Utility Commission

Now comes James Danielewicz t/d/b/a Limousines for Less, by his attorneys, Caldwell & Kearns, and moves to dismiss the Protest of Pocono Limousines Services, Inc., representing in support thereof the following:

1. Protests to the Application of James Danielewicz were due on January 10, 1994.
2. The Protest of Pocono Limousine Services, Inc. was delivered to counsel for the Applicant on January 12, 1994, bearing a postmark of January 10, 1994. A photocopy of the envelope is attached as Exhibit "A".
3. The copy of the Protest which was served upon the Protestant does not indicate that it was accompanied by Certificate of Mailing.

RECEIVED
JAN 13 1994
PH 1:17
P. P. U. C.
INFO CONTROL DIV.



4. The filing of the subject Protest, therefore, does not comply with the requirements of 52 Pa. Code §1.11 and was not timely filed.

5. Although other Protests were filed in this matter, negotiations are pending which applicant believes will eliminate the same and will permit the Application to be submitted to the Commission without an oral hearing on the record.

WHEREFORE, Applicant respectfully moves that the Protest of Pocono Limousine Services, Inc. be dismissed.

Respectfully submitted,

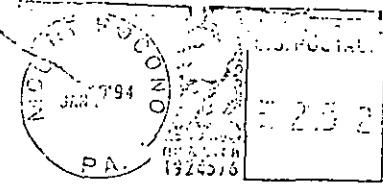
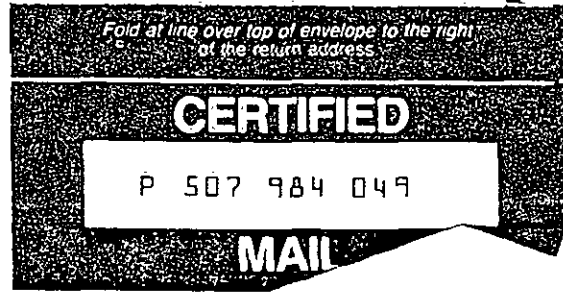
CALDWELL & KEARNS
3631 North Front Street
Harrisburg, PA 17110
(717) 232-7661

Date: 1/13/94

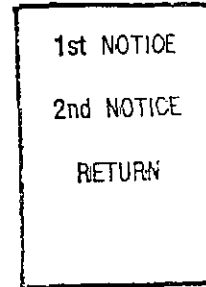
By James D. Campbell, Jr.
James D. Campbell, Jr., Esquire
Attorney's I.D. No. 07051
Attorney for Applicant

A

JOSEPH P. HANYON
—ATTORNEY AT LAW—
MOUNT POCONO PROFESSIONAL CENTRE
FOUR FORK STREET, SUITE 2030
MOUNT POCONO, PA 18344



James D. Campbell, Jr., Esq.
8631 North Front-Street
Harrisburg, PA 17110



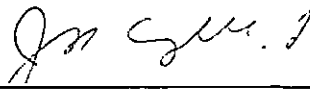
CERTIFIED MAIL, RRR

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he has this date served a true and correct copy of the foregoing Motion to Dismiss Protest upon the following persons in the manner indicated:

BY U.S. MAIL, POSTAGE PREPAID, FIRST CLASS:

Jospeh P. Hanyon, Esquire
Mount Pocono Professional Centre
Four Fork Street, Suite 2030
Mount Pocono, PA 18344



James D. Campbell, Jr., Esquire

Dated: January 13, 1994

JOSEPH P. HANYON

ATTORNEY AT LAW

MOUNT POCONO PROFESSIONAL CENTRE
FOUR FORK STREET, SUITE 2030
MOUNT POCONO, PA 18344

ORIGINAL

PHONE: (717) 839-8050
FAX: (717) 839-6723

January 31, 1994

John G. Alford, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

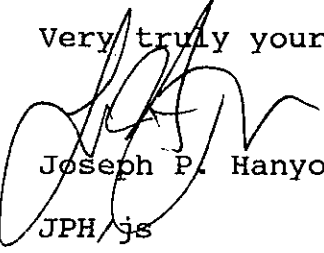
Re: Application of James Danielwicz
A-00108292, F.1, Am-A

Dear Mr. Alford:

Enclosed for service upon you, please find an original Answer to be filed on behalf of Protestant Pocono Limousine Services, Inc. to Applicant's Motion to Dismiss Protest.

Thank you for your attention to this matter.

Very truly yours,


Joseph P. Hanyon

JPH/js

Encls.

cc: James D. Campbell, Jr., Esq.
Caldwell & Kearns
(w/encls.)

RECEIVED

FEB 7 1994

SECRETARY'S OFFICE
Public Utility Commission

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RECEIVED

FEB 7 1994

**SECRETARY'S OFFICE
Public Utility Commission**

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

APPLICATION OF JAMES DANIELWICZ
t/d/b/a LIMOUSINES FOR LESS

Docket No. A-00108292,
F.1 Am-A

ANSWER TO MOTION TO DISMISS PROTEST

NOW COMES, Pocono Limousine Services, Inc. by and through its attorney, Joseph P. Hanyon, Esq. and files the following Answer to Applicant's Motion to Dismiss its Protest.

1. Denied. It is denied that protests to the application of James Danielwicz were due on January 10, 1994. To the contrary, protest to said application may be served and/or filed with the Public Utility Commission on or after January 10, 1994.

2. Admitted. By way of further answer, a copy of Protestant's certificate of service was filed with the Public Utility Commission and served upon counsel subsequent to the mailing of the protest. A copy of the certificate of service is attached hereto as Exhibit "A".

3. Denied. It is denied that protestant's protest does not comply with the requirements of 52 Pa. Code Section 1.11 and was not timely filed. To the contrary, the protest was filed within the permissible time limits.

DOCKETED
FEB 23 1994

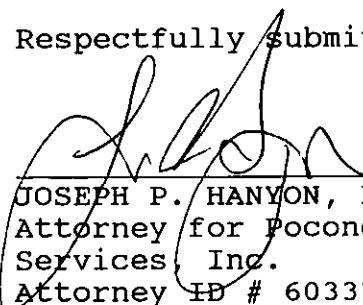
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FOLDER**

4. Denied. Protestant lacks sufficient information from which to form a belief about the truth of the averment, therefore, same is denied.

WHEREFORE, protestant respectfully request that the applicant's motion be denied.

Dated: January 31, 1994

Respectfully submitted,



JOSEPH P. HANYON, ESQ.
Attorney for Pocono Limousine
Services, Inc.
Attorney ID # 60337
Mt. Pocono Professional Centre
Four Fork Street, Suite 2030
Mt. Pocono, PA 18344
(717) 839-8050

CERTIFICATE OF SERVICE

I, Joan Sorrentino, hereby certify that service of the foregoing Answer to Motion to Dismiss Protest was made upon the following person(s) at the address(es) listed below, by mailing, first class, postage paid, a true copy in the depository of the United States Postal Service.

James D. Campbell, Jr., Esq.
Caldwell & Kearns
Attorneys for Applicant
3631 North Front Street
Harrisburg, PA 17110

Penna. Public Utility Comm.
P.O. Box 3265
Harrisburg, PA 17105-3265

Dated: January 31, 1994



JOAN SORRENTINO

CERTIFICATE OF SERVICE

I, Joan Sorrentino, hereby certify that service of the foregoing Protest of Pocono Limousine Service, Inc. was made upon the following person(s) at the address(es) listed below, by mailing, first class, postage paid, a true copy in the depository of the United States Postal Service, via Certified Mail, Return Receipt Requested.

Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-2265

James D. Campbell, Jr., Esq.
8631 North Front Street
Harrisburg, PA 17110

Dated: January 10, 1994



JOAN SORRENTINO

COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265
May 3, 1994

In Re: A-00108292, F0001, AmA

(See attached list)

Application of James Danielewicz, t/d/b/a Limousines for Less

For amendment to common carrier certificate, which grants the right, to transport, persons, in limousine service, from points in the Borough of Stroudsburg, Monroe County, Pennsylvania, and from points within an airline distance of ten (10) statute miles of the limits of the said Borough of Stroudsburg, to the Allentown/Bethlehem/Easton Airport, and vice versa; SO AS TO PERMIT the transportation of persons, in limousine service, between points in the counties of Monroe and Pike, and from points in said counties, to points within an airline distance of fifty (50) statute miles of the limits thereof, and vice versa.

NOTICE

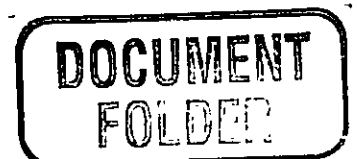
This is to inform you that an initial hearing on the above captioned case will be held Thursday, June 30, 1994 at 10:00 a.m. in Room 318, Scranton State Office Building, 100 Lackawanna Avenue, Scranton, Pennsylvania.

The presiding officer in this proceeding is Administrative Law Judge Herbert S. Cohen. Judge Cohen can be contacted at P.O. Box 3265, Harrisburg, Pennsylvania 17105-3265; telephone (717) 783-5452.

If you intend to file exhibits, please be advised that two copies of all hearing exhibits to be presented into evidence must be submitted to the Reporter and an additional copy should be furnished to the presiding officer and each party of record.

IF YOU ARE A PERSON WITH A DISABILITY, AND WISH TO ATTEND THE HEARING SCHEDULED ABOVE, AND REQUIRE AN AUXILIARY AID, SERVICE, OR OTHER ACCOMMODATION TO PARTICIPATE IN THE PROCEEDING, PLEASE CONTACT THE AT&T RELAY SERVICE NUMBER (TT) 1-800-654-5988 OR NORMA R. LEWIS (VOICE ONLY) (717) 787-1399 AT THE PENNSYLVANIA PUBLIC UTILITY COMMISSION (PUC) TO DISCUSS HOW THE PUC MAY BEST ACCOMMODATE YOUR NEEDS.

DOCKETED
MAY 12 1994



pc: Judge Cohen
John Frazier - BPL
Norma Lewis
Bud Huntington, Scheduler
Stephen Springer
Beth Plantz
Docket Room

A-00108292, F0001, AmA Application of James Danielewicz, t/d/b/a Limousines for Less

For amendment to common carrier certificate, which grants the right, to transport, persons, in limousine service, from points in the borough of Stroudsburg, Monroe County, Pennsylvania, and from points within an airline distance of ten (10) statute miles of the limits of the said Borough of Stroudsburg, to the Allentown/Bethlehem/Easton Airport, and vice versa: SO AS TO PERMIT the transportation of persons, in limousine service, between points in the counties of Monroe and Pike, and from points in said counties, to points within an airline distance of fifty (50) statute miles of the limits thereof, and vice versa.

James D. Campbell, Jr., Esquire
Caldwell & Kearns
3631 North Front Street
Harrisburg, PA 17110

Janes Danielewicz, t/a
Limousines For Less
315 Clermont Avenue
Stroudsburg, PA 18360

Richard T. Mulcahey, Jr., Esquire
Schubert, Bellwoar, Mallon & Walheim
1400 Two Penn Center Plaza
1500 John F. Kennedy Blvd.
Philadelphia, PA 19102

Joseph P. Hanyon, Esquire
Mount Pocono Professional Centre
Four Fork Street/Suite 2030
Mount Pocono, PA 18344

ORIGINAL

RIP

CALDWELL & KEARNS

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

3631 NORTH FRONT STREET
HARRISBURG, PENNSYLVANIA 17110-1533

717-232-7661

FAX: 717-232-2766

THOMAS D. CALDWELL, JR.
RICHARD L. KEARNS
CARL G. WASS
JAMES R. CLIPPINGER
CHARLES J. DEHART, III
JAMES D. CAMPBELL, JR.
JAMES L. GOLDSMITH
TIMOTHY J. MARK
JAMES G. NEALON, III
MATTHEW R. GOVER
DEBORAH A. CAVACINI
TIMOTHY W. ROMBERGER

May 6, 1994

John G. Alford, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Application of James Danielewicz
A-00108292, F.1, Am-A

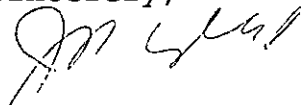
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INFO. CONTROL DIV.

Dear Secretary Alford:

Please find enclosed herewith the original and two copies of a Restrictive Amendment and Stipulation of Protestants filed in the above matter.

As indicated in the Stipulation of Protestants, Mr. Mulcahey desires to remain of record for the purpose of receiving all notices and orders issued in this proceeding.

Sincerely,



James D. Campbell, Jr.
CALDWELL & KEARNS

JDCJr/njd

Enclosure

cc: Richard T. Mulcahey, Jr., Esquire
Joseph P. Hanyon, Esquire
James Danielewicz

DOCUMENT
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MAY 10 AM 9:10
INFO. CONTROL DIV.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of
James Danielewicz, t/d/b/a
Limousines for Less

*
* A-00108292, F.1 Am-A
*

RESTRICTIVE AMENDMENT

NOW COMES James Danielewicz, t/d/b/a Limousines for Less, and amends its application so that the same shall read as follows:

To transport, as a common carrier, persons, in limousine service, between points in the Counties of Monroe and Pike, and from points in said counties, to points within an airline distances of ten (10) statute miles of the limits thereof, and vice versa;

Subject to the following condition:

That no right, power, or privilege is granted to originate service in the counties of Lehigh and Northampton, except as presently authorized.

James Danielewicz, t/d/b/a
Limousines for Less

DOCKETED

MAY 20 1994

By: J. D. Campbell
James D. Campbell, Esquire
Attorney for Applicant

Dated: April 8, 1994

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of
James Danielewicz, t/d/b/a
Limousines for Less

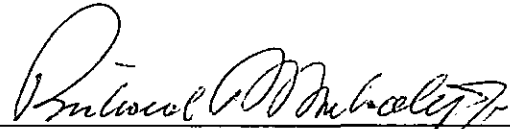
*
* A-00108292, F.1 Am-A
*

RESTRICTIVE AMENDMENT AND STIPULATION OF PROTESTANTS

AND NOW COMES Corporate Livery, Inc., J & J Leasing & Rentals, Inc., and LoMa, Inc., t/d/b/a A.B.E. Limo & Bus Service, t/d/b/a AERO Chauffeured Limo & Mini Bus Service (Protestants), Protestants to the above application, by their attorney, Richard T. Mulcahey, Jr., and stipulates based on the foregoing restrictive amendment dated April 8, 1994, and conditioned upon its acceptance by the Pennsylvania Public Utility Commission and any grants of authority in this proceeding being consistent with the restrictive amendment, the Protestants hereby withdraw their protests. Counsel for the Protestants will remain of record for the purpose of receiving all notices and orders issued in this proceeding. The notices and orders should be sent to counsel for the Protestants at the following address:

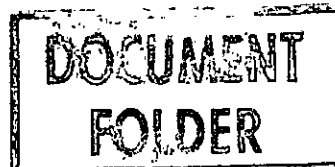
Richard T. Mulcahey, Jr., Esquire
Schubert, Bellwoar, Mallon & Walheim
1400 Two Penn Center Plaza
Philadelphia, PA 19102

DOCKETED
MAY 20 1994



Richard T. Mulcahey, Jr., Esquire
Attorney for Protestants
Corporate Livery, Inc., J & J
Leasing & Rentals, Inc., and LoMa,
Inc., t/d/b/a A.B.E. Limo & Bus
Service, t/d/b/a AERO Chauffeured
Limo & Mini Bus Service

Dated: April 8, 1994



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265
June 29, 1994

In Re: A-00108292, F0001, AmA

(See letter dated 05/03/94)

Application of James Danielewicz, t/d/b/a Limousines for Less

For amendment to common carrier certificate, which grants the right, to transport, persons, in limousine service, from points in the Borough of Stroudsburg, Monroe County, Pennsylvania, and from points within an airline distance of ten (10) statute miles of the limits of the said Borough of Stroudsburg, to the Allentown/Bethlehem/Easton Airport, and vice versa; SO AS TO PERMIT the transportation of persons, in limousine service, between points in the counties of Monroe and Pike, and from points in said counties, to points within an airline distance of fifty (50) statute miles of the limits thereof, and vice versa.

NOTICE

This notice is to inform you that at the request of counsel for applicant the hearing scheduled for Thursday, June 30, 1994 at 10:00 a.m. in Scranton, Pennsylvania, was cancelled.

As soon as the restrictive amendment and letters withdrawing all protests are received in this office, the subject application will be referred to the Bureau of Transportation for review and report to the Commission.

The presiding officer in this proceeding is Administrative Law Judge Herbert S. Cohen. Judge Cohen can be contacted at P.O. Box 3265, Harrisburg, Pennsylvania 17105-3265; telephone (717) 783-5452.

pc: Judge Cohen
John Frazier - BPL
Norma Lewis
Bud Huntington, Scheduler
Stephen Springer
Beth Plantz
Docket Room

DOCKETED
JUL 7 1994

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HARRISBURG, PA
BUREAU OF TRANSPORTATION
CONTROL DIV.

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CALDWELL & KEARNS

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

3631 NORTH FRONT STREET
HARRISBURG, PENNSYLVANIA 17110-1533

717-232-7661

FAX: 717-232-2766

THOMAS D. CALDWELL, JR.
RICHARD L. KEARNS
CARL G. WASS
JAMES R. CLIPPINGER
CHARLES J. DEHART, III
JAMES D. CAMPBELL, JR.
JAMES L. GOLDSMITH
TIMOTHY I. MARK
JAMES G. NEALON, III
MATTHEW R. GOVER
DEBORAH A. CAVACINI
TIMOTHY W. ROMBERGER

June 30, 1994

John G. Alford, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Application of James Danielewicz
t/d/b/a Limousines for Less
A-00108292, F.1, Am-A

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PA. P.U.C.
INFO. CONTROL DIV.

Dear Secretary Alford:

Please find enclosed herewith the original and two copies of a Restrictive Amendment filed in the above captioned matter. This Restrictive Amendment adds a second condition pursuant to which the protest of Pocono Limousine Services, Inc. has been withdrawn.

This matter may now be referred for modified procedure and I will appreciate your assistance in that regard.

Sincerely,

James D. Campbell, Jr.
CALDWELL & KEARNS

DOCUMENT
FOLDER

JDCJr/njd

Enclosure

cc: Joseph Hanyon, Esquire
Richard Mulcahey, Esquire
Honorable Herbert S. Cohen
Administrative Law Judge
Bud Huntington

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JUL 1 1994

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

SECRETARY'S OFFICE
Public Utility Commission

Application of
James Danielewicz, t/d/b/a
Limousines for Less

*
* A-00108292, F.1 Am-A
*

RESTRICTIVE AMENDMENT

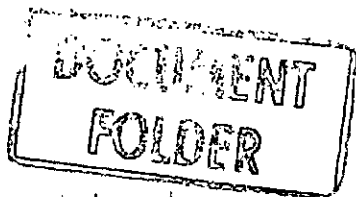
NOW COMES James Danielewicz, t/d/b/a Limousines for Less, and amends its application so that the same shall read as follows:

To transport, as a common carrier, persons, in limousine service, between points in the Counties of Monroe and Pike, and from points in said counties, to points within an airline distances of ten (10) statute miles of the limits thereof, and vice versa;

Subject to the following conditions:

- (1) That no right, power, or privilege is granted to originate service in the counties of Lehigh and Northampton, except as presently authorized; and
- (2) That no right, power, or privilege is granted to originate service from points in the county of Monroe which are located more than ten (10) statute miles of the limits of the Borough of Stroudsburg.

James Danielewicz, t/d/b/a
Limousines for Less



By: J D Campbell
James D. Campbell, Esquire
Attorney for Applicant

Dated: 6/27/94

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JUL 07 1994

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

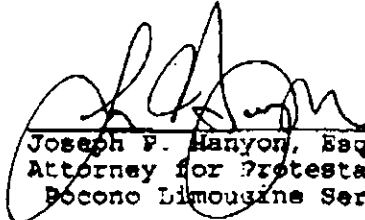
Application of
James Danielewicz, c/d/b/a
Limousines for Less

*
* A-00108292, P.1 Am-A
*

RESTRICTIVE AMENDMENT AND STIPULATION OF PROTESTANT

AND NOW COMES Pocono Limousine Services, Inc. (Protestant), Protestant to the above application, and stipulates based on the foregoing restrictive amendment dated June 27, 1994, and conditioned upon its acceptance by the Pennsylvania Public Utility Commission and any grants of authority in this proceeding being consistent with the restrictive amendment, the Protestant hereby withdraws its protest. Protestant will remain of record for the purpose of receiving all notices and orders issued in this proceeding. The notices and orders should be sent to the Protestant at the following address:

Joseph P. Hanyon, Esquire
Mount Pocono Professional Center
Four Fork Street, Suite 2030
Mount Pocono, PA 18344



Joseph P. Hanyon, Esquire
Attorney for Protestant
Pocono Limousine Service, Inc.

DOCKETED
JUL 14 1994

**DOCUMENT
FOLDER**

FILE

CONTINUED