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June 18, 2015

RECEIVED

JUN 18 2015

**\*\*VIA FEDERAL EXPRESS\*\***

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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

**Re: Application of Kadamema, LLC**  
**PUC Docket No.: A-2015-2482376**

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: Kadamema, LLC (w/encls.)  
Cadden Bros. Moving & Storage, Inc. (w/encls.)



adequate and safe transportation system.

5. 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.

Specifically:

(a) Applicant has not shown or demonstrated that it possesses the pertinent terminal facilities and communication network for the proposed service.

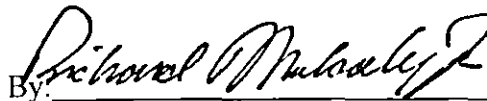
(b) Applicant has not shown or demonstrated that it has pertinent equipment and vehicles for the proposed service.

(c) Applicant has not shown or demonstrated that it possesses the pertinent safety program for the proposed service or that it will be able obtain a satisfactory safety rating.

(d) Applicant has not shown or demonstrated that it has the pertinent financial wherewithal to operate the proposed service.

(e) Applicant has not shown or demonstrated that it has a minimum of two (2) years experience with a licensed household goods carrier or the equivalent necessary for successful new operations.

Respectfully submitted,

By: 

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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 JUN 18, 2015, 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, Kadamema, LLC at 10944 State Route 6, Laceyville, PA 18623.

DATE: June 18, 2015      Mary Anne Cranage  
MARY ANNE CRANAGE

**RECEIVED**

JUN 18 2015

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

8071 4187 7013

0215 Form ID No.

FedEx Copy

**1 From**  
 Date: 6/18/15 Sender's FedEx Account Number: 1067-3646-4  
 Sender's Name: RICHARD J. MULLANEY, JR., ESQ Phone: 215 587-0107  
 Company: SCHUBERT GALLAGHER TYLER & M  
 Address: 121 S BROAD ST FL 20  
 City: PHILADELPHIA State: PA ZIP: 19107-4533

**2 Your Internal Billing Reference**  
MATHEW J 25209  
CANDICE 215034

**3 To**  
 Recipient's Name: ROSEMARY CH. AUSTIN Phone: 717 792-7777  
 Company: SECRETARY  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
COMMONWEALTH KEYSTONE BLDG. 2ND. FL.  
 Address: 407 NORTH ST.  
 City: HARRISBURG State: PA ZIP: 17120  
 0118259637



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**4 Express Package Service** \* To most locations  
 NOTE: Service order has changed. Please select carefully.  
 Packages up to 150 lbs. For packages over 150 lbs., use the FedEx Express Freight US Airbill!

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 FedEx Priority Overnight  
 FedEx Standard Overnight  
 2 or 3 Business Days  
 FedEx 2Day A.M.  
 FedEx 2Day  
 FedEx Express Saver

**5 Packaging** \* Declared value limit \$500  
 FedEx Envelope\*  FedEx Pak\*  FedEx Box  FedEx Tube  Other

**6 Special Handling and Delivery Signature Options**  
 SATURDAY DELIVERY  
 No Signature Required  
 Direct Signature  
 Indirect Signature  
 Does this shipment contain dangerous goods?  
 No  Yes  
 Dry Ice  Cargo Aircraft Only

**7 Payment Bill to:**  
 Enter FedEx Acct. No. or Credit Card No. below. Obtain recip Acct. No.   
 Sender Acct. No. in Section I will be billed  Recipient  Third Party  Credit Card  Cash/Check  
 Total Packages: 1 Total Weight: 1 lbs Total Declared Value: \$ 00 Credit Card Auth.         

Our liability is limited to US\$100 unless you declare a higher value. See the current FedEx Service Guide for details.

