

**Law Offices of
Smith & Smith, LLC**

ORIGINAL

515 Linden Street • Allentown, PA 18101
610-437-2300 • Fax 610-770-9457

Shannon Piergallini Smith

May 1, 2006

Of Counsel:
Lee Smith
Also LLM in Taxation

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

RE: Pennsylvania Public Utility Commission
Bureau of Transportation and Safety vs.
ABC Moving Service
No. C-20066238

RECEIVED
2006 MAY -3 AM 9:06
PA.P.U.C. BUREAU
SECRETARY'S BUREAU

**DOCUMENT
FOLDER**

Dear Mr. McNulty:

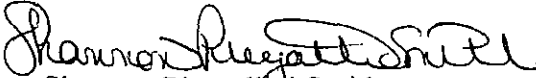
Enclosed herewith for service and filing please find an original and three copies of ABC Moving Service's Answer to the Complaint filed by the Bureau of Transportation and Safety. I hope that the Answer provides information relevant to the Bureau's determination to proceed forward in this matter.

I understand that a Public Utility Commission officer contacted my client with respect to the very matter complained of in the Complaint several months ago. At that time, my client explained that ABC Moving Service has the authority to provide household good relocation out of state. My client further explained that if a client inquires about a move within Pennsylvania, the client is informed that ABC Moving Service may provide labor assistance only due to the fact that it is not licensed to move within Pennsylvania.

ABC Moving Services does not advertise relocation services within Pennsylvania. It does advertise moves between states and moves within the state of New Jersey. ABC Moving Services is fully federally licensed and insured to provide interstate moves and does so using the highest standards.

Should you need any additional information concerning this matter, please do not hesitate to contact me.

Sincerely,


Shannon Piergallini Smith

SPS/ger
Enclosures
c: ABC Moving Service

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RECEIVED
2006 MAY -3 AM 9:06
P.A.P.U.C.
SECRETARY'S BUREAU

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY
COMMISSION, BUREAU OF
TRANSPORTATION AND SAFETY

vs.

DOCKET NO. C-20066238

ABC MOVING SERVICE

DOCUMENT
FOLDER

ANSWER

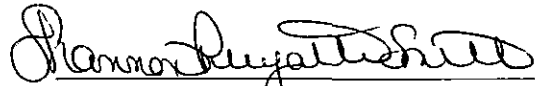
NOW COMES, ABC Moving Service, by and through its attorneys, Smith & Smith, LLC and sets forth the following Answer in response to the Complaint filed by the Pennsylvania Public Utility Commission, Bureau of Transportation and Safety:

1. Admitted.
2. Denied. At no time did Respondent hold itself out as providing moving services for compensation within the Commonwealth of Pennsylvania. By way of further answer, Respondent is fully federally licensed and insured to provide out of state moves as well as moves within the state of New Jersey. Moreover, if Respondent is contacted regarding a move within the Commonwealth of Pennsylvania, Respondent advises the individual that Respondent may provide labor assistance only due to the fact that Respondent does not have authority to provide moving services to locations within the Commonwealth of Pennsylvania when the move originates in the Commonwealth.
3. Denied. Respondent incorporates herein by reference the averment set forth in paragraph 2 above.

DOCKETED
MAY 08 2006

WHEREFORE, Respondent, ABC Moving Services respectfully requests that the
Complaint filed by the Bureau of Transportation and Safety be denied and dismissed.

SMITH & SMITH, LLC

A handwritten signature in black ink, appearing to read "Shannon Piergalli Smith", written over a horizontal line.

Shannon Piergalli Smith, Esq.

515 Linden Street

Allentown, PA 18101

610-437-2300

I.D. No. 80065

VERIFICATION

I, MICKEY JADALLAH, hereby state and verify that I am the President of ABC Moving Service, Inc., the Respondent in this action, that I have read the foregoing pleading, and that the facts set forth therein are true and correct to the best of my knowledge, information and belief.

I understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities.

Date: 5/10/10



MICKEY JADALLAH