

FAXED
12-13-96 12:20 pm

KRINER, KOERBER & KIRK, P.C.

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WILLIAM C. KRINER
DWIGHT L. KOERBER, JR.
ALAN F. KIRK

COUNSEL TO THE FIRM
WILLIAM T. DAVIS

December 13, 1996

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

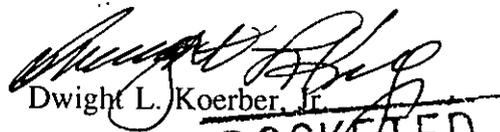
**RE: South Hills Movers, Inc.
A-109506, F.1, AM-C**

Dear Mr. Alford:

I represent McNaughton Bros., Inc., a protestant in this proceeding. Upon further evaluation of its interests, my client is determined that it would no longer oppose this application. Accordingly, I hereby withdraw the protest of McNaughton Bros., Inc.

Very truly yours,

KRINER, KOERBER & KIRK, P.C.

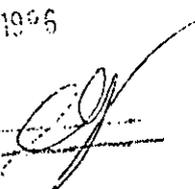

Dwight L. Koerber, Jr.

DLK/slh

cc: John A. Vuono, Esquire
McNaughton Bros., Inc.

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APPLICATION DOCKET

DEC 16 1996

ENTRY NO. 

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Law Offices

VUONO & GRAY

John A. Vuono
William A. Gray
Mark T. Vuono*
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December 13, 1996

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Re: South Hills Movers, Inc.-Transferee
and Leelease, Inc.-Transferor
Docket No. A-0099073
Our File 3713-20

SHM, Inc.-Transferee and
Leelease, Inc.-Transferor
Docket No. A-00109506, F.1, Am-C
Our File 1507-61

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Mr. Peter S. Marzolf, Supervisor
Technical Review Section
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

**BY FACSIMILE
(HARD COPY TO FOLLOW)
(717) 787-5961**

Dear Mr. Marzolf:

This letter will confirm our several telephone conversations concerning the above transfer applications.

As we discussed, a protest to the South Hills Movers, Inc. application was filed in behalf of McNaughton Bros., Inc. by attorney Dwight L. Koerber, Jr. After we had an opportunity to explain the applications to Mr. Koerber and his client, it was agreed that the protest would be withdrawn.

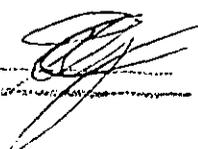
In that connection, I am enclosing a copy of the letter dated December 13 to the Secretary of the Commission from Mr. Koerber withdrawing the protest of McNaughton Bros., Inc.

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As a result of this action, both applications are now unopposed

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DEC 16 1996

ENTRY NO. 

Mr. Peter S. Marzolf
Page Two
December 13, 1996

As we advised you at the time of filing, these transfer applications are directly related to the corporate reorganization of the Lee family companies which family owns all of the issued and outstanding stock of the transferees and Leelease, Inc. the transferor. As we advised you, for a number of tax and practical reasons, it is imperative that the reorganization become effective as of December 31, 1996 and we requested expedited handling of the applications.

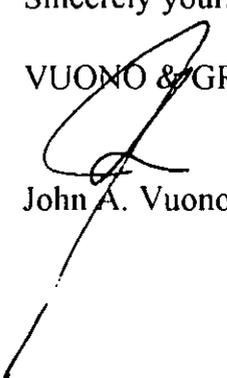
We appreciate the fact that the Commission promptly published the applications in the Pennsylvania Bulletin. We understand that the last public meeting of the Commission in 1996 is scheduled for Thursday, December 19. We understand that the Commission is not scheduled to meet again until mid-January. In view of the circumstances, we respectfully request that these applications be placed on the agenda for that public meeting so that we can meet the December 31 deadline.

In connection with the applications, we note a minor discrepancy in the Pennsylvania Bulletin notice with respect to the SHM application where the name of the carrier is shown as "SMH". We assume that this error will be corrected in the Commission's order of approval.

We appreciate your continued cooperation.

Sincerely yours,

VUONO & GRAY



John A. Vuono

CW/3171

Enclosure

cc: Dwight L. Koerber, Jr., Esq.
South Hills Movers, Inc.
SHM, Inc.

FILED
12-13-96 12:00 pm

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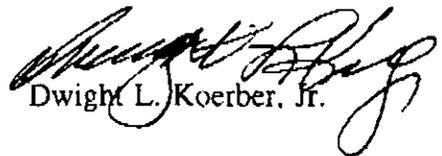
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Dwight L. Koerber, Jr.

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