

**MARATHON MOVING & STORAGE Co. Inc.**

**404 COURT STREET**

**Binghamton, NY 13904**

**607-722-0100 March 21, 1997**

000106

**PETITION TO REINSTATE AUTHORITY**

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

A-00109681

PROTHONOTARY'S OFFICE

97 MAR 26 11:13:07

Dear Mr. Alford,

This is a request to reinstate the authority Number 109681, which was acquired under Hinkley Moving and Storage. William R. Burkholder and George T. Edwards III are owners of Marathon Moving & Storage Co. Inc. (a NY corporation), and general managers of Marathon Hauling Corp. (a NY corporation). Marathon Moving & Storage is purchasing the assets Marathon Hauling Corp. Marathon Hauling Corp. has purchased Hinkley Moving & Storage from Brian Hinkley. Burkholder and Edwards have been managing all aspects of Marathon Hauling Corp. for four years. On October 10 1996 a Petition To Reinstate Authority was sent to your office. Please see copy enclosed. We were delayed significantly by some unavoidable circumstances. On March 3, 1997 Marathon Moving & Storage Co. Inc. was incorporated. We understand that Marathon Hauling Corp. did not file for a authority transfer. Hinkley Moving & storage has been paid for in full by Marathon Hauling Corp. Hinkley Moving & Storage is now an asset of Marathon Hauling Corp. Marathon Moving & Storage is purchasing the assets of Marathon Hauling Corp. Marathon Hauling Corp. has had certificates of insurance for coverage of Hinkley Moving & Storage. I have enclosed these for your review. I understand that the authority was revoked for insurance coverage reasons. If you could please reinstate PUC # 109681 so we can advertise in the Yellow Pages that close in eight days. We will be becoming an American Red Ball Agent in the area and feel that this affiliation will serve the people of the northern Pennsylvania area very well. Thank you for your concern.

Sincerely,

George T. Edwards III & William R. Burkholder

INDEXED & FILED

APR 21 1997

DOCUMENT FOLDER

ERM

[REQ4] [ ] DATE [10] 1 [96] SEQ NO [ 99] T [C]

APPL/RESPONDENT [MARATHON MOVING&STORAGE]  
[ ]  
[ ]

DESCRIPTION [A-00109681-LTR-REQ FOR REINSTATEMENT OF ]  
[AUTHORITY - NOT BEING CONSIDERED AS A ]  
[PETITION FOR REINSTATEMENT ]

DISTRIBUTION [P. MARZOLF ]  
[10-25-96 ]  
[ ]

ENTERED BY [KLICK ]  
[T]

**MARATHON MOVING & STORAGE**

**404 COURT STREET**

**Binghamton, NY 13904** OCT 21 PM 12:49

**607-722-0100---800-877-8558**

**October 10, 1996**

RECEIVED  
PROTHONOTARY'S OFFICE

**PETITION TO REINSTATE AUTHORITY**

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

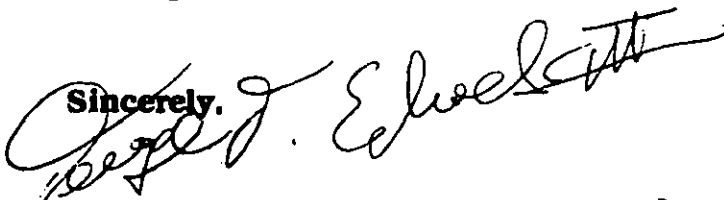
**COPY**

**Dear Mr. Alford,**

**This is a request to reinstate the authority Number 109681, which was acquired under Hinkley Moving and Storage.**

**William R. Burkholder and George T. Edwards III are owners of Marathon Moving & Storage Co. Inc. (a NY corporation), and general managers of Marathon Hauling Corp. (a NY corporation). Marathon Moving & Storage is purchasing the assets Marathon Hauling Corp. Marathon Hauling Corp. has purchased Hinkley Moving & Storage from Brian Hinkley. Burkholder and Edwards have been managing all aspects of Marathon Hauling Corp. for three years. They seek authority under their corporation so they can continue to service their customer's needs in the northern Pennsylvania area. As you can see there are several transactions that need to take place and Burkholder and Edwards apologize for the delays and are working hard to resolve these issues. Therefore they wish to obtain the PUC authority under their corporation at this time. Thank you for your patience and for working with us on this resolution. A transfer application will be forth coming in a few days.**

**Sincerely,**



**George T. Edwards III — 607-722-0100  
William R. Burkholder**

RECEIVED  
PROTHONOTARY'S OFFICE  
97 MAR 28 AM 11:15

99

G

CERTIFICATE OF INSURANCE

Issue Date  
6/28/1996

Producer - 590

Arthur J. Gallagher  
12444 Powerscourt Dr.  
St. Louis, MO 63131  
(314) 965-4346

This certificate is issued as a matter of information only and confers no rights upon the certificate holder. This certificate does not amend, extend or alter the coverage afforded by the policies below.

COMPANIES AFFORDING COVERAGE

Company Letter A LEGION INSURANCE CO.

Company Letter B

Company Letter C

Company Letter D

Company Letter E

Insured

MOLLEN TRANSFER & STORAGE (1453)  
ATLAS VAN LINES, INC.  
P. O. BOX 509  
EVANSVILLE, IN 47703

COVERAGES

This is to certify that policies of insurance listed below have been issued to the insured named above for the policy period indicated, notwithstanding any requirement, term or condition of any contract or other document with respect to which this certificate may be issued or may pertain the insurance afforded by the policies described herein is subject to all the terms, exclusions, and conditions of such policies.

| Co Ltr | Type of Insurance  | Policy Number | Policy Effective Date (MM/DD/YY) | Policy Expiration Date (MM/DD/YY) | Limits (/1,000)  |
|--------|--|---------------|----------------------------------|-----------------------------------|--|
|        | General Liability<br><input type="checkbox"/> Commercial General Liab.<br><input type="checkbox"/> Claims Made <input type="checkbox"/> Occur.<br><input type="checkbox"/> Owners & Contractors Prot.<br><input type="checkbox"/><br><input type="checkbox"/>  |               |                                  |                                   | General Aggregate \$<br>Products-Comp/Op Agg. \$<br>Personal & Adv. Injury \$<br>Each Occurrence \$<br>Fire Damage (any one fire) \$<br>Med. Expense (any 1 person) \$ |
|        | Automobile Liability<br><input type="checkbox"/> Any Auto<br><input type="checkbox"/> All Owned Autos<br><input type="checkbox"/> Scheduled Autos<br><input type="checkbox"/> Hired Autos<br><input type="checkbox"/> Non-Owned Autos<br><input type="checkbox"/> Garage Liability<br><input type="checkbox"/> |               |                                  |                                   | Combined Single Limit \$<br>Bodily Injury (per person) \$<br>Bodily Injury (per accident) \$<br>Property Damage \$   |
|        | Excess Liability<br><input type="checkbox"/> Umbrella Form<br><input type="checkbox"/> Other Than Umbrella Form  |               |                                  |                                   | Each Occurrence<br>Aggregate   |
|        | Workers' Compensation And Employers' Liability   |               |                                  |                                   | Statutory Limits<br>Each Accident<br>Disease - Policy Limit<br>Disease - Each Employee   |
| A      | Other:<br>PHYSICAL DAMAGE  | BA1-000103    | 07/01/96                         | 07/01/97                          | DEDUCTIBLES:<br>\$250 COMPREHENSIVE<br>\$500 COLLISION   |

Description of Operations/Locations/Vehicles/Special Items

1987 INT'L STRAIGHT TRUCK, UNIT 23129, S/N 1HTLDUXP7HH503648  
EFFECTIVE 04/24/95

Certificate Holder

Cancellation

Should any of the above described policies be cancelled before the expiration date thereof, the issuing company will endeavor to mail 10 days written notice to the certificate holder named to the left, but failure to mail such notice shall impose no obligation or liability of any kind upon the company, its agents or representatives.

Authorized Representative

# ACORD CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YY)  
1/14/97

PRODUCER  
Haylor, Freyer & Coon, Inc.  
231 Salina Meadows Pkwy  
P.O. Box 4743  
Syracuse, NY 13221

315-451-1500

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

**COMPANIES AFFORDING COVERAGE**

|           |                  |
|-----------|------------------|
| COMPANY A | General Accident |
| COMPANY B | US Capital       |
| COMPANY C |                  |
| COMPANY D |                  |

INSURED  
Marathon Hauling Corp.  
404 Court St.  
Binghamton NY 13902

**COVERAGES**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED, NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN. THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

| CO LTR                    | TYPE OF INSURANCE  | POLICY NUMBER | POLICY EFFECTIVE DATE (MM/DD/YY) | POLICY EXPIRATION DATE (MM/DD/YY) | LIMITS  |                     |       |                  |           |                           |           |                          |           |
|---------------------------|--|---------------|----------------------------------|-----------------------------------|---|---------------------|-------|------------------|-----------|---------------------------|-----------|--------------------------|-----------|
| A                         | <b>GENERAL LIABILITY</b><br><input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY<br><input type="checkbox"/> CLAIMS MADE <input checked="" type="checkbox"/> OCCUR<br><input type="checkbox"/> OWNER'S & CONTRACTOR'S PROT                             | CGL5001901    | 12/19/96                         | 12/19/97                          | GENERAL AGGREGATE \$ 1000000<br>PRODUCTS - COMP/OP AGG \$ 1000000<br>PERSONAL & ADV INJURY \$ 1000000<br>EACH OCCURRENCE \$ 1000000<br>FIRE DAMAGE (Any one fire) \$ 50000<br>MED EXP (Any one person) \$ 5000  |                     |       |                  |           |                           |           |                          |           |
| B                         | <b>AUTOMOBILE LIABILITY</b><br><input type="checkbox"/> ANY AUTO<br><input type="checkbox"/> ALL OWNED AUTOS<br><input type="checkbox"/> SCHEDULED AUTOS<br><input checked="" type="checkbox"/> HIRED AUTOS<br><input checked="" type="checkbox"/> NON-OWNED AUTOS | CLP12794      | 6/01/96                          | 6/01/97                           | COMBINED SINGLE LIMIT \$ 1000000<br>BODILY INJURY (Per person) \$<br>BODILY INJURY (Per accident) \$<br>PROPERTY DAMAGE \$  |                     |       |                  |           |                           |           |                          |           |
|                           | <b>GARAGE LIABILITY</b><br><input type="checkbox"/> ANY AUTO   |               |                                  |                                   | AUTO ONLY - EA ACCIDENT \$<br>OTHER THAN AUTO ONLY: \$<br>EACH ACCIDENT \$<br>AGGREGATE \$  |                     |       |                  |           |                           |           |                          |           |
|                           | <b>EXCESS LIABILITY</b><br><input type="checkbox"/> UMBRELLA FORM<br><input type="checkbox"/> OTHER THAN UMBRELLA FORM   |               |                                  |                                   | EACH OCCURRENCE \$<br>AGGREGATE \$  |                     |       |                  |           |                           |           |                          |           |
| A                         | <b>WORKERS COMPENSATION AND EMPLOYERS' LIABILITY</b><br>THE PROPRIETOR/PARTNERS/EXECUTIVE OFFICERS ARE: <input type="checkbox"/> INCL <input type="checkbox"/> EXCL  | WC02824160    | 12/19/96                         | 12/19/97                          | <table border="1"> <tr> <td>WC STATUTORY LIMITS</td> <td>OTHER</td> </tr> <tr> <td>EL EACH ACCIDENT</td> <td>\$ 100000</td> </tr> <tr> <td>EL DISEASE - POLICY LIMIT</td> <td>\$ 500000</td> </tr> <tr> <td>EL DISEASE - EA EMPLOYEE</td> <td>\$ 100000</td> </tr> </table> | WC STATUTORY LIMITS | OTHER | EL EACH ACCIDENT | \$ 100000 | EL DISEASE - POLICY LIMIT | \$ 500000 | EL DISEASE - EA EMPLOYEE | \$ 100000 |
| WC STATUTORY LIMITS       | OTHER  |               |                                  |                                   |   |                     |       |                  |           |                           |           |                          |           |
| EL EACH ACCIDENT          | \$ 100000  |               |                                  |                                   |   |                     |       |                  |           |                           |           |                          |           |
| EL DISEASE - POLICY LIMIT | \$ 500000  |               |                                  |                                   |   |                     |       |                  |           |                           |           |                          |           |
| EL DISEASE - EA EMPLOYEE  | \$ 100000  |               |                                  |                                   |   |                     |       |                  |           |                           |           |                          |           |
|                           | OTHER  |               |                                  |                                   |   |                     |       |                  |           |                           |           |                          |           |

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS  
"While vehicle being leased"

**CERTIFICATE HOLDER**

**CANCELLATION**  
SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 10 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE  
*[Signature]*

COMMONWEALTH OF PENNSYLVANIA  
PUBLIC UTILITY COMMISSION

000094

97 MAR 26 AM 11:15

RECEIVED  
PROTHONOTARY'S OFFICE

DATE: March 26, 1997

SUBJECT: A-00109681 - Petition to Reinstate Authority filed on behalf of Brian C. Hinkley

RECEIVED

TO: James McNulty, Acting Prothonotary  
Office of the Prothonotary

MAR 31 1997

FROM: Peter S. Marzolf, Supervisor  
Applications Review Section  
Motor Carrier Services and Enforcement Division  
Bureau of Transportation and Safety

BUREAU OF  
TRANSPORTATION & SAFETY

By order entered November 4, 1996, the Commission canceled the certificate of public convenience issued to Brian C. Hinkley. By letter dated October 10, 1996, a Petition to Reinstate Authority (copy attached) was submitted to the Commission by George T. Edwards, III, on behalf of Brian C. Hinkley.

As the result of a telephone conversation with the office of John Alford on March 26, 1997, it has come to our attention that the Petition to Reinstate Authority was neither docketed nor assigned to the Office of Special Assistants for their review and preparation of a recommendation.

I am requesting that the attached Petition to Reinstate Authority be assigned to the Office of Special Assistants. Your assistance in this matter is appreciated.

PSM:wph

DOCKETED  
APR 21 1997  
DOCUMENT  
FOLDER

RECEIVED

APR 01 1997

Office of Prothonotary  
Public Utility Commission

ERM

**MARATHON MOVING & STORAGE Co. Inc.**  
**404 COURT STREET**

**Binghamton, NY 13904**

**607-722-0100---800-877-8558**

**October 10, 1996**

**COPY**

**PETITION TO REINSTATE AUTHORITY**

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

*A-00109681*

**Dear Mr. Alford,**

**This is a request to reinstate the authority Number 109681, which was acquired under Hinkley Moving and Storage.**

**William R. Burkholder and George T. Edwards III are owners of Marathon Moving & Storage Co. Inc. (a NY corporation), and general managers of Marathon Hauling Corp. (a NY corporation). Marathon Moving & Storage is purchasing the assets Marathon Hauling Corp. Marathon Hauling Corp. has purchased Hinkley Moving & Storage from Brian Hinkley. Burkholder and Edwards have been managing all aspects of Marathon Hauling Corp. for three years. They seek authority under their corporation so they can continue to service their customer's needs in the northern Pennsylvania area. As you can see there are several transactions that need to take place and Burkholder and Edwards apologize for the delays and are working hard to resolve these issues. Therefore they wish to obtain the PUC authority under their corporation at this time. Thank you for your patience and for working with us on this resolution. A transfer application will be forth coming in a few days.**

**Sincerely,**

**George T. Edwards III**  
**William R. Burkholder**

**ERM**

**MARATHON MOVING & STORAGE**

**404 COURT STREET**

**Binghamton, NY 13904** OCT 21 PM 12:49

**607-722-0100---800-877-8558**

**October 10, 1996**

RECEIVED  
PROTHONOTARY'S OFFICE

**PETITION TO REINSTATE AUTHORITY**

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

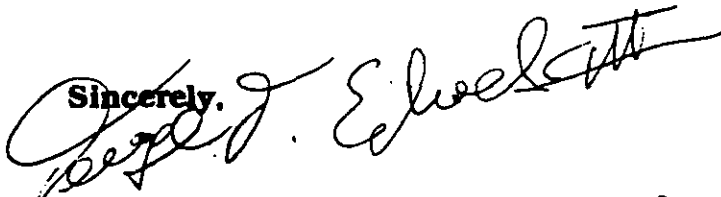
**COPY**

**Dear Mr. Alford,**

**This is a request to reinstate the authority Number 109681, which was acquired under Hinkley Moving and Storage.**

**William R. Burkholder and George T. Edwards III are owners of Marathon Moving & Storage Co. Inc. (a NY corporation), and general managers of Marathon Hauling Corp. (a NY corporation). Marathon Moving & Storage is purchasing the assets Marathon Hauling Corp. Marathon Hauling Corp. has purchased Hinkley Moving & Storage from Brian Hinkley. Burkholder and Edwards have been managing all aspects of Marathon Hauling Corp. for three years. They seek authority under their corporation so they can continue to service their customer's needs in the northern Pennsylvania area. As you can see there are several transactions that need to take place and Burkholder and Edwards apologize for the delays and are working hard to resolve these issues. Therefore they wish to obtain the PUC authority under their corporation at this time. Thank you for your patience and for working with us on this resolution. A transfer application will be forthcoming in a few days.**

**Sincerely,**



**George T. Edwards III — 607-722-0100  
William R. Burkholder**

RECEIVED  
PROTHONOTARY'S OFFICE  
9/11/96 2:04 PM

99

COMMONWEALTH OF PENNSYLVANIA

DATE: April 15, 1997

SUBJECT: A-00109681

TO: Office of Special Assistants

FROM: *WJZ* John G. Alford, Secretary

HINKLEY MOVING AND STORAGE

---

Attached is copy of a Petition to Reinstate Authority of Brian Hinkley filed by George T. Edwards, III in connection with the above docketed proceeding.

This matter is assigned to your office for appropriate action.

Attachment

wjz

DOCKETED  
APR 21 1997

DOCUMENT  
FOLDER