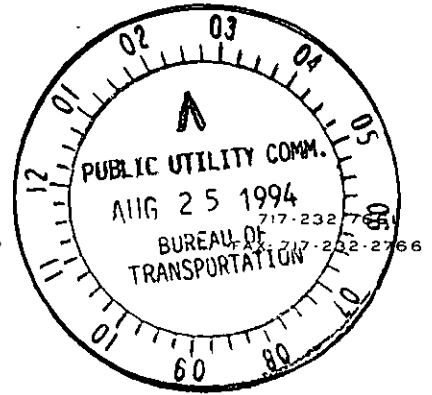


CALDWELL & KEARNS
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW

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 C. NEALON, III
MATTHEW R. GOVER
DEBORAH A. CAVACINI
TIMOTHY W. ROMBERGER



August 23, 1994

John G. Alford, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17120

Re: Application of Edward Chervinsky
Docket No.: A-00111462


REC'D
AUG 25 1994
BUREAU OF TRANSPORTATION
PUBLIC UTILITY COMM.

Dear Secretary Alford:

Please find enclosed herewith the original and two copies of a Protest filed by Lizrick Tours, Inc., t/d/b/a as Royal Star Limousine Service in the above-captioned matter.

A copy has been provided to Applicant as indicated below.

Sincerely,

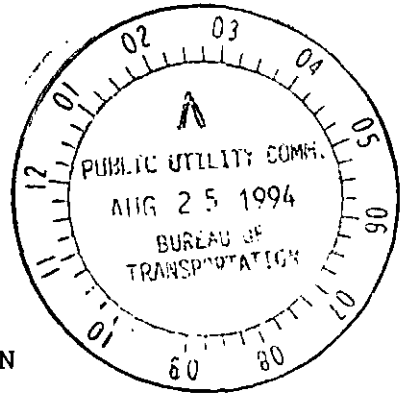

James D. Campbell, Jr.
CALDWELL & KEARNS

JDCJr:slc
Enclosures

cc: Edward Chervinsky,
Donna Surmick, Lizrick Tours, Inc.

36129.1

DOCUMENT
FOLDER



BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In Re: Application of : A-00111462
Edward Chervinsky :
: :

RECORDED
AUG 25 1994 11:33 AM
INFO. CONTROL DIV.

PROTEST

1. AND NOW, comes LIZRICK TOURS, INC. t/d/b/a ROYAL STAR LIMOUSINE SERVICE, 199 North Cedar Street, Hazleton, PA 18201 (717-829-7053) and protests the above Application.

2. The service and facilities of the Protestant and other authorized carriers are ample to meet all the requirements of the shipping public in the territory involved in this Application.

3. The approval of the Application would be prejudicial to your Protestant and other authorized carriers in this territory in that it will authorize additional competition with the potential resulting loss in revenue and less satisfactory service of the public.

4. Approval of the Application would be contrary to the public interest.

5. Your Protestant holds operating authority docketed to A-00107419, a copy of which is attached hereto as Exhibit A and made a part hereof.

DOCUMENT
FOLDER

DOCKETED

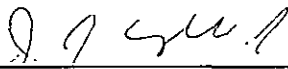
AUG 25 1994

6. Protestant's interest would be satisfied and this protest would be withdrawn if the application were amended to exclude the right to originate service from points located south of Interstate Highway Route 80.

7. Pursuant to Section 333(c) of the Public Utility Law, Protestant requests Applicant or its attorney to furnish the undersigned with a list of the names and addresses of all witnesses whom it intends to call, and the names and addresses of the supporting shippers they will represent, at least ten (10) days prior to the commencement of evidentiary hearings in this case.

WHEREFORE, LIZRICK TOURS, INC., t/d/b/a ROYAL STAR LIMOUSINE SERVICE respectfully prays that the above Application be dismissed.

LIZRICK TOURS, INC., t/b/d/a
ROYAL STAR LIMOUSINE SERVICE

By: 
James D. Campbell, Jr.
CALDWELL & KEARNS
3631 North Front St.
Harrisburg, Pa. 17110

Dated: August 23, 1994
36130.1

To transport, as a common carrier, persons in limousine service, between points in the city of Hazleton, Luzerne County, and within an airline distance of thirty-five (35) statute miles of the limits of said city, and from points in that territory to points in Pennsylvania, and return;

subject to the following conditions:

That the applicant shall comply with the rules and regulations contained at 32 Pa. Code §29.332, §29.333 and §29.334.

IT IS FURTHER ORDERED: That upon compliance with the requirements of the Pennsylvania Public Utility Code and the rules and regulations of the Commission relative to the filing and acceptance of evidence of insurance and a tariff establishing just and reasonable rates, a certificate issue evidencing the Commission's approval of the right to operate as above-determined.

IT IS FURTHER ORDERED: That in the event the applicant has not, on or before sixty (60) days from the date of the service of this order, complied with the requirements hereinbefore set forth, the application shall be dismissed without further proceedings.

IT IS FURTHER ORDERED: That the authority granted herein, to the extent that it duplicates authority now held by or subsequently granted to the applicant, shall not be construed as conferring more than one operating right.

BY THE COMMISSION,



Jerry Rich
Secretary

(SEAL)

ORDER ADOPTED: October 29, 1987

ORDER ENTERED: NOV 06 1987

5

EXHIBIT A

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In Re: Application of : A-00111462
Edward Chervinsky :
: :
: :

PROTEST

RECEIVED
OCT 29 11 38
P.A.U.C.
INFO. CONTROL DIV.

1. AND NOW, comes LIZRICK TOURS, INC. t/d/b/a ROYAL STAR LIMOUSINE SERVICE, 199 North Cedar Street, Hazleton, PA 18201 (717-829-7053) and protests the above Application.

2. The service and facilities of the Protestant and other authorized carriers are ample to meet all the requirements of the shipping public in the territory involved in this Application.

3. The approval of the Application would be prejudicial to your Protestant and other authorized carriers in this territory in that it will authorize additional competition with the potential resulting loss in revenue and less satisfactory service of the public.

4. Approval of the Application would be contrary to the public interest.


5. Your Protestant holds operating authority docketed to A-00107419, a copy of which is attached hereto as Exhibit A and made a part hereof.

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LIZRICK TOURS, INC., t/b/d/a
ROYAL STAR LIMOUSINE SERVICE

By: 
James D. Campbell, Jr.
CALDWELL & KEARNS
3631 North Front St.
Harrisburg, Pa. 17110

Dated: August 23, 1994
36130.1

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limousine service, between points in the city of
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limits of said city, and from points in that
territory to points in Pennsylvania, and return;

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and regulations contained at 92 Pa. Code
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one operating right.

BY THE COMMISSION,


Jerry Rich
Secretary

(SEAL)

ORDER ADOPTED: October 29, 1987

ORDER ENTERED: NOV 06 1987

3

EXHIBIT A

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In Re: Application of : A-00111462
Edward Chervinsky :
:

PROTEST

RECORDED
51 AUG 23 PM 3:38
PA. P. U. C.
INFO. CONTROL DIV.

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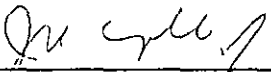
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7. Pursuant to Section 333(c) of the Public Utility Law, Protestant requests Applicant or its attorney to furnish the undersigned with a list of the names and addresses of all witnesses whom it intends to call, and the names and addresses of the supporting shippers they will represent, at least ten (10) days prior to the commencement of evidentiary hearings in this case.

WHEREFORE, LIZRICK TOURS, INC., t/d/b/a ROYAL STAR LIMOUSINE SERVICE respectfully prays that the above Application be dismissed.

LIZRICK TOURS, INC., t/b/d/a
ROYAL STAR LIMOUSINE SERVICE

By: 
James D. Campbell, Jr.
CALDWELL & KEARNS
3631 North Front St.
Harrisburg, Pa. 17110

Dated: August 23, 1994
36130.1

To transport, as a common carrier, persons in limousine service, between points in the city of Hazleton, Luzerne County, and within an airline distance of thirty-five (35) statute miles of the limits of said city, and from points in that territory to points in Pennsylvania, and return;

subject to the following conditions:

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IT IS FURTHER ORDERED: That the authority granted herein, to the extent that it duplicates authority now held by or subsequently granted to the applicant, shall not be construed as conferring more than one operating right.

BY THE COMMISSION,


Jerry Rich
Secretary

(SEAL)

ORDER ADOPTED: October 29, 1987

ORDER ENTERED: NOV 06 1987

JOSEPH P. HANYON

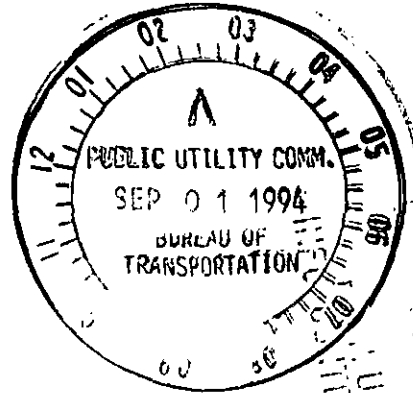
ATTORNEY AT LAW

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

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

August 24, 1994

CERTIFIED MAIL, RRR



U.S. POSTAL DIV.
SEP 01 1994
HARRISBURG PA 17105-2265

111462

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

Edward Chevinsky
74 Art Street
Edwardsville, PA 18704

Re: Protest of Pocono Limousine Services, Inc.

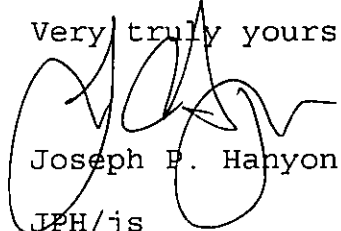
Ladies and Gentlemen:

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

By copy of this letter, I am completing service upon Edward Chervinsky.

Thank you for your attention.

Very truly yours,


Joseph P. Hanyon
JPH/js

Encls.

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

DOCUMENT
FOLDER

43

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN RE:
APPLICATION OF
EDWARD CHERVINSKY

REC'D
SEP 2 1994
INFO. CONTROL DIV.

PROTEST ON BEHALF OF POCONO LIMOUSINE SERVICE, INC.

DOCUMENT
FOLDER

DOCKETED
APPLICATION DOCKET
SEP 2 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

EDWARD CHERVINSKY

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 applicant will become competitive with and detrimental to existing service of Pocono Limousine Service, Inc. Protestant

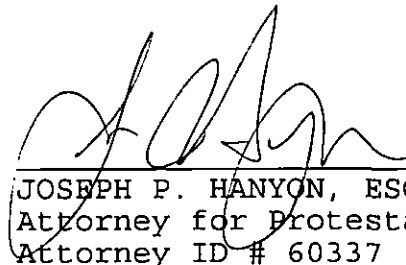
owns or has access to a full range of equipment for limousine service, inter alia, within the certified area sought by applicant, has satisfactory maintenance facilities, skilled and experienced drivers and other employees.

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.

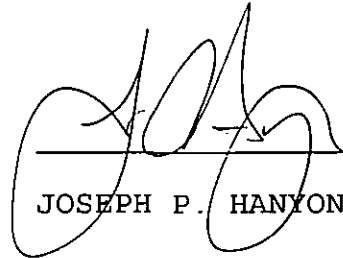


JOSEPH P. HANYON, ESQUIRE
Attorney for Protestant
Attorney ID # 60337
Mt. Pocono Professional Centre
Four Fork Street, Suite 2030
Mt. Pocono, PA 18344
(717) 839-8050

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document upon the applicant, Edward Chevinsky, 74 Art Street, Edwardsville, Pennsylvania, by United States mail, first class, postage prepaid.

Dated: August 24, 1994



JOSEPH P. HANYON, ESQ.

PENNSYLVANIA BULLETIN, VOL. 24, No. 34, August 20, 1994

"A-00111462., Edward Chervinsky (74 Art Street, Edwardsville, Luzerne County, Pennsylvania 18704) - persons, in limousine service, between points in the County of Luzerne, and from points in said county to within airline distance of 50 statute miles of the limits thereof and vice versa."

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"

LAW OFFICES
SCHUBERT, BELLWOAR, MALLON & WALHEIM

A PROFESSIONAL CORPORATION
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

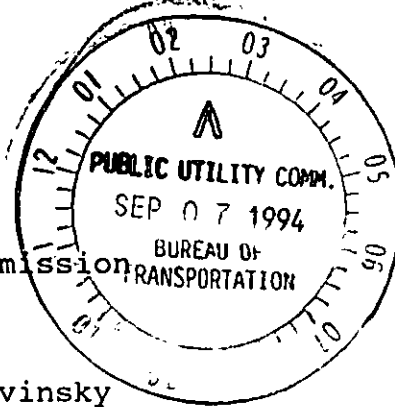
JOSEPH G. DENNY III
OF COUNSEL

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

NEW JERSEY OFFICE
311 W. CUTHBERT BOULEVARD
HADDON TOWNSHIP, NJ 08108
(609) 854-5757

ALSO MEMBER OF
NEW JERSEY BAR
1 NJ MANAGING ATTORNEY

September 2, 1994



DIRECT-DIAL NO.
(215) 587-0107

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

Re: Application of Edward Chervinsky
PUC Docket No. A-00111462

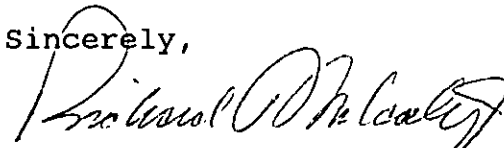
Dear Mr. Alford:

Please be advised that this office represents Elite Industries, Inc., t/d/b/a Elite Limo, 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: Mr. Edward Chervinsky
Elite Industries, Inc.

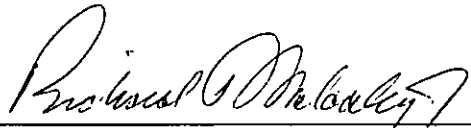
DOCUMENT
FOLDER

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

Elite Industries, Inc., t/d/b/a Elite Limo

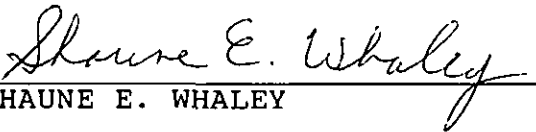
To transport, as a common carrier,
persons in limousine service,
between points in the Counties of
Lehigh, Northampton, Bucks, Berks
and Carbon and from points in said
Counties to points in Pennsylvania.

EXHIBIT "A"

CERTIFICATE OF SERVICE

I, Shaune E. Whaley, hereby certify that on September 2, 1994, I forwarded by first-class mail, postage pre-paid, a copy of the Protest filed on behalf of Elite Industries, Inc., t/d/b/a Elite Limo, to Applicant, Edward Chervinsky, 75 Arch Street, Edwardsville, PA 18704.

DATE: September 2, 1994


SHAUNE E. WHALEY

LAW OFFICES
SCHUBERT, BELLWOAR, MALLON & WALHEIM

A PROFESSIONAL CORPORATION
TWO PENN CENTER PLAZA, SUITE 1400
1500 JOHN F. KENNEDY BOULEVARD
PHILADELPHIA, PA 19102-1890
(215) 569-3535
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HARRY J. J. BELLWOAR III
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RICHARD T. MULCAHEY, JR.
JAMES M. TYLER

JOSEPH G. DENNY III
OF COUNSEL
JOHN J. CAHILL
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1951-1989

NEW JERSEY OFFICE
311 W. CUTHBERT BOULEVARD
HADDON TOWNSHIP, NJ 08108
(609) 854-5757

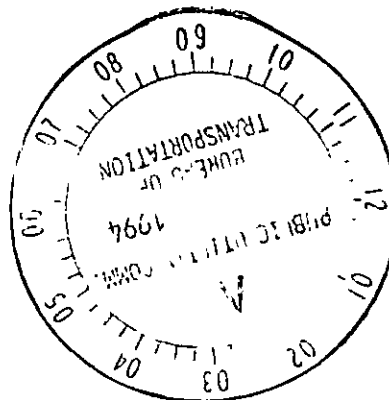
• ALSO MEMBER OF
NEW JERSEY BAR
1 NJ MANAGING ATTORNEY

September 2, 1994

DIRECT-DIAL NO.
(215) 587-0107

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

Re: Application of Edward Chervinsky
PUC Docket No. A-00111462



Dear Mr. Alford:

Please be advised that this office represents J. J. Serafin, Inc., t/d/b/a AAAA-Limousine, 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: Mr. Edward Chervinsky
J. J. Serafin, Inc., t/d/b/a AAAA-Limousine

RECEIVED
SEP 2 1994

SECRETARY'S OFFICE
Public Utility Commission

**DOCUMENT
FOLDER**


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.

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Respectfully submitted,

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

J. J. Serafin, Inc.,
t/d/b/a AAAA-Limousine

To transport, as a common carrier, persons in limousine service, between points in the County of Luzerne and from said county to points in Pennsylvania and return.

EXHIBIT "A"

CERTIFICATE OF SERVICE

I, Shaune E. Whaley, hereby certify that on September 2, 1994, I forwarded by first-class mail, postage pre-paid, a copy of the Protest filed on behalf of J. J. Serafin, Inc., t/d/b/a AAAA-Limousine, to Applicant, Edward Chervinsky, 75 Arch Street, Edwardsville, PA 18704.

DATE: September 2, 1994


SHAUNE E. WHALEY

LAW OFFICES
SCHUBERT, BELLWOAR, MALLON & WALHEIM

A PROFESSIONAL CORPORATION

TWO PENN CENTER PLAZA, SUITE 1400

1500 JOHN F. KENNEDY BOULEVARD

PHILADELPHIA, PA 19102-1890

(215) 569-3535

FAX: (215) 557-7426

ORIGINAL

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JOHN J. CAHILL, JR.
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JOSEPH A. WALHEIM
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RICHARD T. MULCAHEY, JR.
JAMES M. TYLER

JOSEPH G. DENNY III
OF COUNSEL

JOHN J. CAHILL

1922-1982

THOMAS M. SCHUBERT

1951-1989

NEW JERSEY OFFICE

311 W. CUTHBERT BOULEVARD

HADDON TOWNSHIP, NJ 08108

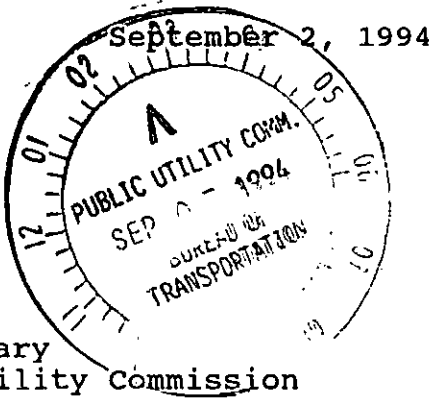
(609) 854-5757

• ALSO MEMBER OF
NEW JERSEY BAR

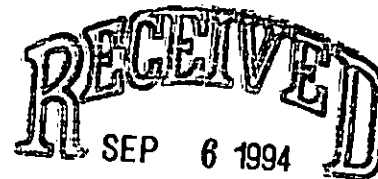
• NJ MANAGING ATTORNEY

DIRECT-DIAL NO.

(215) 587-0107



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



SECRETARY'S OFFICE
Public Utility Commission

Re: Application of Edward Chervinsky
PUC Docket No. A-00111462

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

Enclosure

cc: Mr. Edward Chervinsky
LoMa, Inc.

**DOCUMENT
FOLDER**

RECEIVED
SEP 6 1994

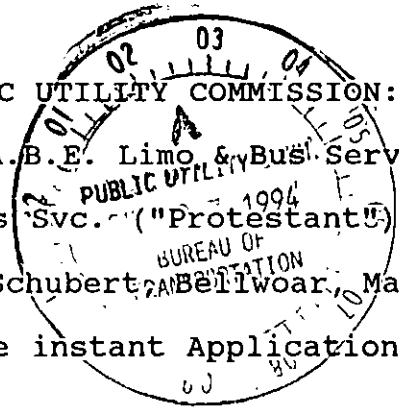
BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION SECRETARY'S OFFICE
Public Utility Commission

IN RE: APPLICATION OF : PUC DOCKET NO.: A-00111462
EDWARD CHERVINSKY

PROTEST

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:
DOCKETED
APPLICATION DOCKET
SEP 7 1994
ENTRY No. mw

LoMa, Inc., t/d/b/a A.B.E. Limo & Bus Service,
t/d/b/a AERO Chauffeured Limo & Mini Bus Svc.
1829 East Livingston Street
Allentown, PA 18103
(215) 821-9303

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

**DOCUMENT
FOLDER**

Richard T. Mulcahey, Jr., Esquire
Schubert, Bellwoar, Mallon & Walheim
1500 John F. Kennedy Boulevard
Two Penn Center Plaza, Suite 1400
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.


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 September 2, 1994, 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, Edward Chervinsky, 75 Arch Street, Edwardsville, PA 18704.

DATE: September 2, 1994


SHAUNE E. WHALEY

LAW OFFICES
SCHUBERT, BELLWOAR, MALLON & WALHEIM

A PROFESSIONAL CORPORATION
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

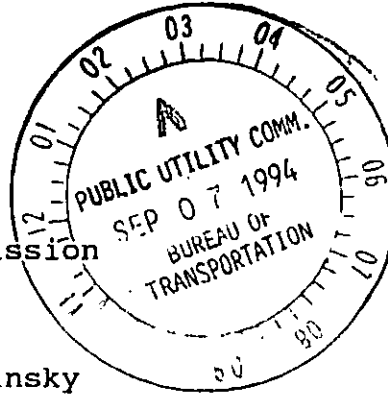
JOSEPH G. DENNY III
OF COUNSEL

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

NEW JERSEY OFFICE
311 W. CUTHBERT BOULEVARD
HADDON TOWNSHIP, NJ 08108
(609) 854-5757

ALSO MEMBER OF
NEW JERSEY BAR
NJ MANAGING ATTORNEY

September 2, 1994



DIRECT-DIAL NO.
(215) 587-0107

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

Re: Application of Edward Chervinsky
PUC Docket No. A-00111462

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.

Sincerely,

RICHARD T. MULCAHEY, JR.

RTM/sew
Enclosures
cc: Mr. Edward Chervinsky
Corporate Livery, Inc.

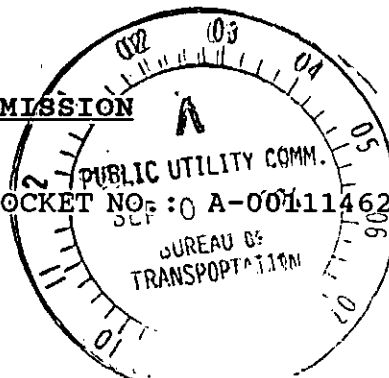
REC'D
94 SEP - 7 1:13
PA. I
INFO. COLL. DIV.

DOCUMENT
FOLDER

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN RE: APPLICATION OF :
EDWARD CHERVINSKY

PUC DOCKET NO: A-00111462



PROTEST

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:

DOCKETED APPLICATION DOCKET SEP 7 1994 ENTRY No. <u>2</u>

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

RECEIVED
SEP - 6 PM 1:13
J.M.C. CONTROL DIV.

The name, address and telephone number of the

Protestant's attorneys are:

**DOCUMENT
FOLDER**

Richard T. Mulcahey, Jr., Esquire
Schubert, Bellwoar, Mallon & Walheim
1500 John F. Kennedy Boulevard
Two Penn Center Plaza, Suite 1400
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.


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 September 2, 1994, I forwarded by first-class mail, postage pre-paid, a copy of the Protest filed on behalf of Corporate Livery, Inc. to Applicant, Edward Chervinsky, 75 Arch Street, Edwardsville, PA 18704.

Date: September 2, 1994

Shaune E. Whaley
SHAUNE E. WHALEY

LAW OFFICES
SCHUBERT, BELLWOAR, MALLON & WALHEIM

ORIGINAL

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

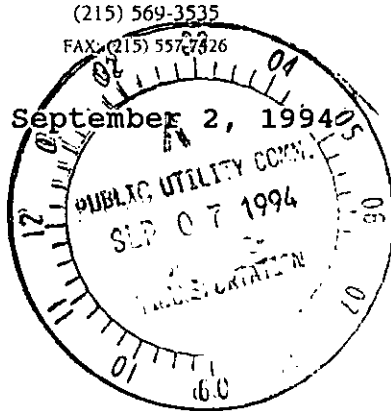
WILLIAM E. SCHUBERT, JR.
HARRY J. J. BELLWOAR III-1
JOHN P. QUINN
JOHN J. CAHILL, JR.
ROBERT T. LYNCH
JOSEPH A. WALHEIM
ROBERT G. BELLWOAR
WILLIAM F. SWEENEY
JOHN P. GALLAGHER
DEBORAH E. KOLODNER
RICHARD T. MULCAHEY, JR.
JAMES M. TYLER

JOSEPH G. DENNY III
OF COUNSEL

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

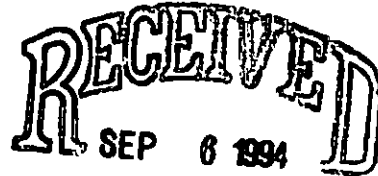
NEW JERSEY OFFICE
311 W. CUTHBERT BOULEVARD
HADDON TOWNSHIP, NJ 08108
(609) 854-5757

ALSO MEMBER OF
NEW JERSEY BAR
NJ MANAGING ATTORNEY



DIRECT-DIAL NO.
(215) 587-0107

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



Re: Application of Edward Chervinsky
PUC Docket No. A-00111462

SECRETARY'S OFFICE
Public Utility Commission

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

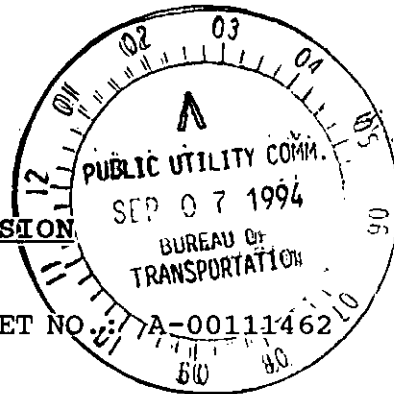
cc: Mr. Edward Chervinsky
J & J Leasing & Rentals, Inc.

DOCUMENT
FOLDER

RECEIVED
SEP 8 1994

SECRETARY'S OFFICE
Public Utility Commission

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION



IN RE: APPLICATION OF :
EDWARD CHERVINSKY

PUC DOCKET NO. A-00111462

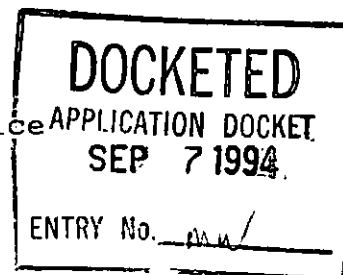
PROTEST

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
1500 John F. Kennedy Boulevard
Two Penn Center Plaza, Suite 1400
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 herein predicated is attached hereto as Exhibit "A" and incorporated by reference herein.

**DOCUMENT
FOLDER**


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 September 2, 1994, 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, Edward Chervinsky, 75 Arch Street, Edwardsville, PA 18704.

DATE: September 2, 1994

Shaune E. Whaley
SHAUNE E. WHALEY

September 26, 1994

RECEIVED
94 OCT 11 11:11 AM
P. O. U. C.
INFO. CONTROL DIV.

John G. Alford, Secretary
Pennsylvania Public Utility Commission
P. O. Box 33265
Harrisburg, PA 17105

Re: Application of Edward Chervinsky
PUC Docket No. A-00111462

Dear Mr. Alford:

Please be advised that I am with drawing my application for limousine service in the county of Luzerne. Because I am one man operating one vehicle, I am not able to handle all the protest I have received during the previous weeks.

If at all possible please refund the filing fee I submitted with the application I filed with your office. Please, kindly acknowledge receipt of the copy of this letter and return it to me for my records. Thank you.

Very truly yours,



Edward Chervinsky

Enclosure **DOCKETED**
OCT 14 1994

**DOCUMENT
FOLDER**

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED
OCT 11 11:11:42
INFORMATION CONTROL DIV.

IN RE:
APPLICATION OF
EDWARD CHERVINSKY

PROTEST ON BEHALF OF POCONO LIMOUSINE SERVICE, INC.

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

EDWARD CHERVINSKY

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 applicant 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 service, inter alia, within the certified area 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, Edward Chevinsky, 74 Art Street, Edwardsville, Pennsylvania, by United States mail, first class, postage prepaid.

Dated: August 26, 1994



JOSEPH P. HANYON, ESQ.

PENNSYLVANIA BULLETIN, VOL. 24, No. 34, August 20, 1994

"A-00111462., Edward Chervinsky (74 Art Street, Edwardsville, Luzerne County, Pennsylvania 18704) - persons, in limousine service, between points in the County of Luzerne, and from points in said county to within airline distance of 50 statute miles of the limits thereof and vice versa."

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"

DATE: October 17, 1994

SUBJECT: A-00111462 Applicatin of Edward Chervinsky

TO: Joyce McGrady, Supervisor
Secretary's Bureau, Filing and Assignment Unit

FROM: Janice Zurat, Scheduling Officer
Office of Administrative Law Judge

On September 26, 1994 a Petition for Leave to Withdraw was filed in the above-captioned proceeding by applicant. If no objection is filed to this petition within ten (10) days of service pursuant to 52 Pa., Code 5.94, this proceeding will be closed at that time.

All parties should be notified that the case is closed and a copy of that notification placed in the document folder.

ATTACHMENT

pc:

Michael Ciarvella
Norma Lewis

DOCKETED

OCT 21 1994

**DOCUMENT
FOLDER**

RECEIVED
OCT 19 11:10
FEDERAL BUREAU OF INVESTIGATION
U.S. DEPARTMENT OF JUSTICE
REC'D. CONTROL DIV.