

# ORIGINAL

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN RE: :  
 STACIA H. GROVE t/d/b/a :  
 CENTRAL PENNSYLVANIA :  
 LIMOUSINE SERVICE (562 East :  
 Heatherfield Way, Red Lion, York :  
 County, PA 17356) - persons in :  
 limousine service between points :  
 in the counties of York, Lancaster, :  
 and Dauphin, and from points in the :  
 said territory to points in :  
 Pennsylvania and return :

A-00114058

~~EXTRA COPY~~

PROTIC:DIARY'S OFFICE  
 91 OCT 16 PM 1:59  
 (Vertical stamp)

REHEARING MEMO OF WHITE ROSE LIMOUSINE INC., SUPERIOR TRANSPORTATION SERVICES, INC. t/a SUPERIOR LIMOUSINE SERVICE, KEYSTONE LIMOUSINE INC., UNIQUE LIMOUSINE SERVICE INC., SALGALS INC. t/d/b/a VILLA LIMOUSINE

PROCEDURAL HISTORY

The applicant Stacia H. Grove t/d/b/a/ Central Pennsylvania Limousine Service ("Applicant") applied for limousine service between points in the counties of York, Lancaster, and Dauphin, and from points in the said territory to points in Pennsylvania and return. The notice of application was printed in the Pennsylvania Bulletin Volume 27, No. 26, June 28, 1997, page 3127. In response to the notice, protests were filed by Superior Transportation Services, Inc. t/a Superior Limousine Service ("Superior"), White Rose Limousine Inc. ("White Rose"), Keystone Limousine Inc. ("Keystone"), Unique Limousine Service Inc. ("Unique"), Salgals Inc. t/d/b/a Villa Limousine ("Villa"), (collectively known as "Protestors"), all of whom are represented by the undersigned counsel and possess certificate authority in the regions applied for.

**DOCKETED**  
 OCT 16 1997

**DOCUMENT FOLDER**

101

The notices of protest all contained requests for the names and addresses of supporting witnesses and the names and addresses of the companies they represent and a summary of their testimony. They also requested a current equipment list, including the year, make, and model together with odometer reading(s) of the vehicles to provide the proposed service. It also included a request for financial statements of the applicant, with evidence of the assets and liabilities and start-up capital. To date no information has been provide to protestors pertaining to the applicant.

Counsel for the applicant filed motions to dismiss or strike the protests of all the protestors on August 7, 1997, and served notice thereof on the parties individually and on their counsel via first class mail. Answers to the motions to dismiss or strike were filed on August 18, 1997, with the prothonotary and served upon counsel for the applicant.

The parties have discussed possible amendments which were proposed by protestor's counsel. No amendments have been agreed upon and none were offered by the applicant.

A prehearing conference has been scheduled for Friday, October 17, 1997 at 10:00.

#### ISSUES

Whether sufficient public demand or need for additional limousine service in the requested territories exists and whether the addition of a new limousine service will serve a useful public

purpose. The protestors will also question whether the applicant possesses the technical and financial ability necessary to operate and provide the proposed services.

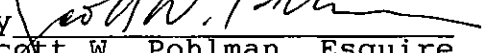
It is also the opinion of the protestors that a new carrier will endanger and impair the operations of the existing carriers and therefore the application of the applicant is contrary to public policy.

#### WITNESSES and TESTIMONY

At the hearing to be scheduled, Superior will be represented by Ray Bensch, who will testify to the above stated issues affecting his company. Unique will be represented by James Salinger, President, who will testify to the above stated issues affecting his company. Keystone will be represented by Ron Stough, Vice President of Operations, he will testify to the above stated issues affecting his company. Villa and White Rose will be represented by Josephine Salinger, President, she will testify to the above stated issues and their affect on her companies.

Dated: Oct. 14, 1997

ROBINSON & GERALDO

By   
Scott W. Pohlman, Esquire  
Attorney I.D. No. 78004  
4407 North Front Street  
P.O. Box 5320  
Harrisburg, Pennsylvania 17110  
(717) 232-8525

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN RE: :  
STACIA H. GROVE t/d/b/a : A-00114058  
CENTRAL PENNSYLVANIA :  
LIMOUSINE SERVICE (562 East :  
Heatherfield Way, Red Lion, York :  
County, PA 17356) - persons in :  
limousine service between points :  
in the counties of York, Lancaster, :  
and Dauphin, and from points in the :  
said territory to points in :  
Pennsylvania and return :


CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing Prehearing Memorandum in the above action, on October 14, 1997, by facsimile and by depositing the same in the United States mail, postage prepaid, in Harrisburg, Pennsylvania addressed to:

SERVICE LIST

Benjamin C. Dunlap, Jr. Esquire  
NAUMAN, SMITH, SHISSLER & HALL  
200 North Third Street, 18th Floor  
P.O. Box 840  
Harrisburg, PA 17108-0840

ROBINSON & GERALDO

By   
Scott W. Pohlman, Esquire  
Attorney I.D. No. 78004  
4407 North Front Street  
Post Office Box 5320  
Harrisburg, Pennsylvania 17110  
(717) 232-8525

PROthonotary's OFFICE

97 OCT 14 PM 1:57

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LAW OFFICES  
**NAUMAN, SMITH, SHISSLER & HALL**

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200 NORTH THIRD STREET

P. O. Box 840

HARRISBURG, PENNSYLVANIA 17108-0840

TELEPHONE

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TELEFAX

(717) 234-1925

SPENCER G. NAUMAN, JR.  
JOHN C. SULLIVAN  
J. STEPHEN FEINOUR  
CRAIG J. STAUDENMAIER  
BENJAMIN C. DUNLAP, JR.  
STEPHEN J. KEENE

COUNSEL  
RALPH W. BOYLES, JR.  
DAVID C. EATON  
DIRECT E-MAIL ADDRESS  
NSSH@REDROSE.NET

October 14, 1997

**HAND DELIVERED**

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

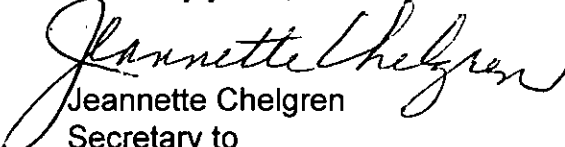
RE: **STACIA H. GROVE t/d/b/a Central Pennsylvania Limousine Service (562 East Heatherfield Way, Red Lion, York County, PA 17345) - persons in limousine service between points in the counties of York, Lancaster, and Dauphin, and from points in the said territory to points in Pennsylvania and return; A-00114058**

Dear Sir:

I enclose an original and three (3) copies of Applicant's Pre-Hearing Memorandum for filing in the above matter. In accordance with the accompanying Certificate of Service we have provided copies of the Memorandum to all active parties of record.

DOCUMENT  
FOLDER

Sincerely yours,

  
Jeannette Chelgren  
Secretary to

Benjamin C. Dunlap, Jr., Esquire

/jc

Enclosures

cc: All Parties of Record  
Stacia H. Grove

RECORDED  
97 OCT 14 PM 3:41  
PROTHONOTARY'S OFFICE

122

**ORIGINAL**

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

**DOCKETED**

**OCT 16 1997**

IN RE:  
STACIA H. GROVE t/d/b/a  
CENTRAL PENNSYLVANIA  
LIMOUSINE SERVICE (562 East  
Heatherfield Way, Red Lion, York  
County, PA 17356) - persons in  
limousine service between points in  
the counties of York, Lancaster,  
and Dauphin, and from points in the  
said territory to points in  
Pennsylvania and return

A-00114058

**ORIGINAL**

**DOCUMENT  
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PROTESTANT'S OFFICE

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10/16/97

**APPLICANT'S PRE-HEARING MEMORANDUM**

**I. HISTORY OF THE PROCEEDINGS**

Stacia H. Grove t/d/b/a Central Pennsylvania Limousine Service ("Grove") filed her application for motor carrier certificate or permit for the transportation of persons in limousine service with the Public Utility Commission ("Commission") on June 16, 1997. The application was advertised in the Pennsylvania Bulletin, Vol. 27, No. 26, page 3127, on June 28, 1997. Protests to the application were filed by Unique Limousine Service, Inc., White Rose Limousine, Inc., Salgals, Inc. t/d/b/a Villa Limousine, Keystone Limousine Inc., and Superior Transportation Services, Inc. t/a Superior Limousine Service (collectively "Protestants") on July 8, 1997.

Grove filed timely Motions to Dismiss or Strike the various protests on August 7, 1997. Among the reasons cited for dismissal of the protests was that each Protestant failed to include a specific "statement of any adverse impact which approval of the

application can be expected to have on the protestant," as required by 52 PA Code § 3.381(c)(1)(iv). The Protestants served their answers to Grove's motions to dismiss or strike on August 18, 1997. The motions remain outstanding. Applicant received a request for amendment from one Protestant, Superior Transportation Services, Inc. See Exhibit "A" attached hereto.

In addition to the Protestants all being represented by the same attorney, three of the protestants, Unique Limousine Service, Inc., White Rose Limousine, Inc., and Salgals, Inc. t/d/b/a Villa Limousine, are under common ownership and apparently are operating in all three service areas under the name Unique Limousine Service. See Exhibit "B" attached hereto. In the absence of any allegation of specific harm to the Protestants which would be contrary to the public interest, one can only surmise the motives behind the protests.

## II. ISSUES

1. Whether the protests of Unique Limousine Service, Inc., White Rose Limousine, Inc., Salgals, Inc. t/d/b/a Villa Limousine, Keystone Limousine Inc., and Superior Transportation Services, Inc. t/a Superior Limousine Service should be dismissed in their entirety for a failure to show or even allege that the entry of a new carrier into the field would endanger or impair their operations to an extent that, on balance, the granting of authority would be contrary to the public interest?

Suggested answer in the affirmative.

2. Whether approval of the application of Stacia H. Grove, t/d/b/a Central Pennsylvania Limousine Service, would serve a useful public purpose, responsive to a public demand or need?

Suggested answer in the affirmative.

3. Whether Stacia H. Grove, t/d/b/a Central Pennsylvania Limousine Service, possesses the technical and financial ability to provide the proposed service and demonstrates a propensity to operate safely and legally?

Suggested answer in the affirmative.

Additional issues may arise during the course of the proceedings, which Applicant reserves the right to address at that time.

### **III. PROPOSED WITNESSES:**

1. Stacia H. Grove  
562 East Heatherfield Way  
Red Lion, PA 17356

Testimony as to her background and financial resources demonstrating that she possesses the technical and financial ability to provide the proposed service as well as a propensity to operate safely and legally.

2. William Wood  
Corestates Dealer Services

Testimony as to Stacia Grove's pre-approval for the leasing of a 1997 Chevrolet Suburban Luxury Van. See Exhibit "C" attached hereto.

3. M. Chris Williams  
Insurance Brokers of York, Inc.

Testimony as to Stacia Grove's pre-approval for commercial liability coverage in the amount of \$1.5 million, effective upon her beginning operations. See Exhibit "D" attached hereto.

4. Frank E. King  
Wedding Photography and Video  
4101 Carlisle Road  
Dover, PA 17315

Company has five offices and would recommend to clients the use of applicant's service if it becomes available. Photographs an average of 50 weddings per month.

5. Prime Time Auto  
E. William Emswiler  
2311 South Queen Street  
York, PA 17402

Received many inquiries regarding limousine services from persons who had experienced difficulties in booking limousine services in York County. See Exhibit "E" attached hereto.

6. Cecile Downie  
1409 Eaton Street  
York, PA 17402

Manages "The Cove" restaurant in Spring Garden Township, York County, and would refer clients and customers to service if it becomes available.

7. Charles Hash  
Gingerbread Man of York  
200 West Philadelphia Street  
York, PA 17404

Owner of Gingerbread Man of York, a local restaurant in the City of York. He would refer clients and customers to service if it becomes available.

8. Beverly A. Scott  
213 South Pleasant Avenue  
Dallastown, PA 17313

She works for York International and will refer clients of the company to use applicant's service if it becomes available.

9. Barbara Lepley  
279 Teila Drive  
Dallastown, PA 17313

Could not rent a limousine service for prom or homecoming, as there were none available at that time. Husband works for Precision Components in York, and would use service for out-of-town clients.

10. Eva H. Hoffman  
365 West Main Street  
Dallastown, PA 17313

Could not rent limousine service for prom or homecoming, as there were none available at that time. Would use applicant's service if it became available.

11. Priscilla Hoffman  
B Dazzled Dance Studio  
30 North Main Street  
Red Lion, PA 17356

She is a licensed travel agent and also owns two dance studios. She would refer clients to use applicant's services for travel to airports and also to dance performances.

12. Dr. and Mrs. Philip Bayliss  
445 Chestnut Lane  
York, PA 17402

General support of application; would use applicant's service if it becomes available.

13. Dorothy E. Johns  
1642 Wyntre Brook Drive - N  
York, PA 17402

General support of application; would use applicant's service if it becomes available. Has used limousine services in the past for transportation to airport.

14. Runkles, Inc.  
Mark A. Johnson, President  
22 East Avenue  
Red Lion, PA 17356

General support of application; would use applicant's service if it becomes available.

15. Larry Anderson  
4126 Wilshire Drive  
York, PA 17402

General support of application; would use applicant's service if it becomes available.

16. Ira J. Berman, M.D.  
2319 South George Street  
York, PA 17402  
(Residence: R.D.#8, York, PA)

General support of application; will use service if it becomes available.

17. Tarry E. Bratton  
90 Manor Road  
Red Lion, PA 17356

General support of application; will use service if it becomes available.

18. Donald P. Gill  
Double Diamond Finishing Systems  
1422 South George Street  
York, PA 17403

General support of application; would use service if it becomes available.

19. Gary Ginter  
Gary Ginter Pest Control  
1033 West Poplar Street  
York, PA 17404

General support of application; would use service if it becomes available.  
Has used other limousine services, when available, for travel to airports.

Applicant reserves the right to amend or modify her witness list up to the time of hearing, dependent upon further issues developed in the course of these proceedings and the availability of witnesses on a certain hearing date.

NAUMAN, SMITH, SHISSLER & HALL

By *Benjamin C. Dunlap, Jr.*  
Benjamin C. Dunlap, Jr., Esquire  
Supreme Court I.D. #66283

200 North Third Street, 18<sup>th</sup> Floor  
P. O. Box 840  
Harrisburg, PA 17108-0840  
717-236-3010  
Attorney for Stacia H. Grove, t/d/b/a  
Central Pennsylvania Limousine Service

Date: October 14, 1997

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F.P.U.C.  
PROTHONOTARY'S OFFICE

**EXHIBIT "A"**

9/17/97

# ROBINSON & GERALDO

A PROFESSIONAL CORPORATION

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17110-5320

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Carlisle, PA 17013  
(717) 245-9451

Washington, D.C.  
1316 Pennsylvania Ave., S.E.  
Washington, D.C. 20003  
(202) 544-2889

September 16, 1997

Ben Dunlap, Esquire  
Nauman, Smith, Shissler & Hall  
P.O. Box 840  
Harrisburg, Pennsylvania 17108-0840

Re: Application of Stacia Grove PUC Application #A-00114058  
Protest of Superior Transportation Services, Inc. t/a  
Superior Limousine Service

Dear Mr. Dunlap:

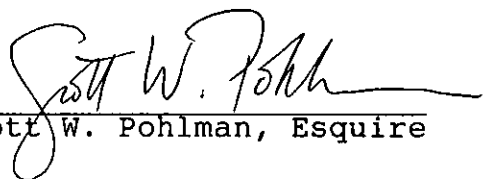
This letter is to confirm our conversation on Friday, September 12, 1997. At that time, I indicated to you that one protestor would be willing to withdraw his protest if the applicant modified her application.

The above referenced protestor has authority to operate in Dauphin County. He would withdraw his protest if the applicant removed Dauphin County as a county of operation in her application.

Please contact me after you have had an opportunity to review this amendment proposal with your client or if you have any questions.

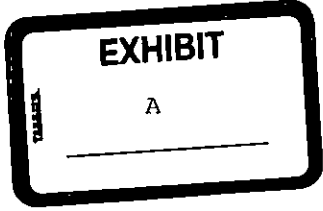
Sincerely yours,

ROBINSON & GERALDO

By   
Scott W. Pohlman, Esquire

SWP:jmf

cc: Superior Transportation Services



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(See Advertisement On This Page)  
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3520 Concord Rd York ..... 755-0823  
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UNIQUE LIMOUSINE  
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(See Advertisement On This Page)  
VILLA LIMOUSINE SERVICE  
New Cumberland ..... 774-5202  
WHITE ROSE LIMOUSINE  
1327 N Duke York ..... 845-8223

**Line Marking Service**

See Pavement & Floor Marking Services

**Linen Supply Service**

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**Linen Retail**

COLLAGE SPECIALTY SHOP INC  
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**Linens Wholesale & Mfrs**

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TABLE LINENS - BLANKETS  
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Victoria's Secret 2801 Whiteford Rd 757-7057  
Victoria's Secret Store  
West Manchester Mall ..... 764-3772

**Linoleum Dealers**

Wolf D N Inc 1214 E Market York .. 848-2879

**Linoleum Layers**

C T ENTERPRISES  
344 W Market Flr 2 Frt York ..... 846-7949

**Linotype Composition**

See Typesetting

**Liquidators**

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210 Falkstone Way York ..... 757-9045  
Diversified Liquidators  
310 S Broad Hellam ..... 755-7450  
EQUIPMENT LIQUIDATORS WAREHOUSE  
18th & Derry Streets Harrisburg ..... 233-5773

**Liquor Stores**

State Liquor Store  
150 Newberry Commons Etters ..... 938-8702

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725 Bierman ..... 854-0769  
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**Livestock Food**

See Feed Dealers

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Cattle Care Services Inc  
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AUTHORIZED DISTRIBUTORS  
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 Black Car-Van-Bus Charter  
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**LAZER LIMOUSINE SERVICES INC.**  
 Toll Free ..... 800 527-3751  
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**LONDONDERRY LIMOUSINE LTD** Lancaster ..... 299-1007  
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**Perfect Party Package** The Lancaster ..... 898-9610

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 Middletown ..... 939-5560

**UNIQUE LIMOUSINE SERVICE INC**  
 988 Stony Battery Rd Lancaster ..... 892-1240  
 (Please See Our Display Ad This Page)

**LINEN SUPPLY SERVICE**

**Baby's Dy-Dee Service** Div Of General Health Care  
 Corporation 1060 Manheim Pk Lancaster ..... 397-3576

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 Labcoats-Patient Gowns-Sheets-Towels  
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Linens 'N Things Inc 2333 Rockvale Rd Lancaster - 392-6138

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Larry Paul's Intimate Apparel Lancaster ..... 464-4588  
 Lily Of France Factory Outlet  
 35 S Willowdale Dr Lancaster ..... 290-7270  
 Shadowline Rockvale Outlet Mall Lancaster ..... 399-9512

**LINOLEUM DEALERS**

Floor Coverings International Lancaster ..... 392-2000

**LIQUIDATORS**

P M Sales & Service 701 Martha Av Lancaster ..... 392-8056

**LIQUOR STORES STATE**

See "Complete List In The Blue Pages Section  
 Of This Directory"; "Penna Commonwealth-  
 Liquor Control Board-State Liquor Stores In  
 Blue Pages"

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**ACORN PRESS INC**  
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 Duling Parke E 802 N Ann Lancaster ..... 393-5186  
 Fulton Press Inc Flyway Business Pk Litz ..... 569-4545  
**INTELLIGENCER PRINTING CO**  
 Process Color Printers & Separations  
 330 Eden Rd Lncstr ..... 291-3100  
 Lancaster Ultra-Graphics Inc  
 1353 Fruitville Pike Lancaster ..... 393-5188  
 Prestige Color Inc 19 Prestige Ln Lancaster ..... 392-1711  
 Veitch Printing Corp The  
 1740 Hempstead Rd Lancaster ..... 291-1100  
 Wickersham Printing Co Inc  
 2959 Old Tree Dr Lancaster ..... 299-5731

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**GRAPHICS TRADE SERVICES**  
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 Commercial Av Lncstr ..... 569-8751

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Hooper Richard A 1147 Litz Pike Lancaster ..... 299-3582  
 Kolb Dennis L 2220 Dairy Rd Lancaster ..... 569-2106  
 Mc Coy Cattle Company  
 Lancaster Stock Yard Lancaster ..... 397-5122  
 Myers Park H 350 Weidler Lane Manheim ..... 898-2205  
**STONEHURST FARM DAIRY SALES INC**  
 1541 Lime Valley Rd Strasburg ..... 687-7475

**LIVESTOCK-COMMISSION**

**DUNLAP WALTER M & SONS INC.**  
 Slaughter Cattle Auctions Mon & Wed  
 Feeder Cattle Auction Every Fri  
 Slaughter Hog Auctions Mon & Wed  
 Selling Private Treaty Daily  
 Lancaster Stock Yard Lancaster ..... 397-5136

Hellbron S L & Sons Stockyard Lancaster ..... 397-9713  
 Lyons Louis & Son Lancaster Stock Yards Lancaster ..... 394-7915  
**NEW HOLLAND SALES STABLES INC**  
 Livestock Auction-Monday-Wednesday-  
 Thursday  
 New Holland ..... 354-4341

**LOADING DOCK EQUIP**

**KELLEY PERMANENT DOCKLEVELERS**  
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 MODERN HANDLING EQUIPMENT CO  
 2501 Durham Rd Bristol ..... 215 943-9100

**MC GUIRE LOADING DOCK EQUIPMENT**  
 OVERHEAD DOOR CO OF LANCASTER  
 569 Furnace Hills Pike ..... 626-2211

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 (Please See Our Display Ad Next Page)

**Aarrow Mortgage Group Inc** Lancaster ..... 295-0095  
**Advanced Mortgage Services**  
 1525 Oregon Pike Lancaster ..... 393-6448

**ADVANTA MORTGAGE USA**  
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**AMERICAN GENERAL FINANCE INC**  
 2054 Fruitville Pike Lancaster ..... 560-4230

**American National Mortgage Corp**  
 1525 Oregon Pike Lancaster ..... 392-1222

**AMERIQUEST MORTGAGE COMPANY**  
 208 East Roseville Rd Lancaster ..... 519-0020

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 • Real Estate Secured Loans  
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 http://www.associatesbranch.com

**ASSOCIATES CONSUMER DISCOUNT COMPANY**  
 128 S Centerville Rd Lancaster ..... 397-7493

**ASSOCIATES FINANCIAL SERVICES**  
 311 Union St Millersburg ..... 692-4917

**BANC ONE CONSUMER DISCOUNT COMPANY**

1010 Wesley Dr Mechanicsburg ..... 691-1446

**BELCO COMMUNITY CREDIT UNION**  
 354 N Prince St Lancaster ..... 393-1116  
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**CONTINUED NEXT LISTING PAGE**

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 The Product Or Service You Want. The Yellow Pages  
 Places Your Name, Address And Telephone Number  
 Before The Buyer At The Very Moment He Wants Your  
 Product Or Service. Use This Handy Buyers Guide. It  
 Saves You Time And Trouble.

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97 OCT 14 PM 3:43

PROTHONOTARY'S OFFICE

**EXHIBIT "C"**

CoreStates Dealer Services  
Auto Lending and Leasing  
Suite 100  
747 Dresner Road  
Horsham PA 19044-0967  
215 830 3400



CoreStates

October 7, 1997

TO: MAC JONES FORD INC  
ATTN: FINANCE DEPT.

FROM: WILLIAM WOOD  
CORESTATES DEALER SERVICES

RE: TODD G. GROVE  
STACIA H. GROVE  
REFERENCE#: 972801543360  
VEHICLE: 97 CHEV SUBURBAN  
AMOUNT FINANCED/CAP COST: \$36,888.00  
TERM: 48

THE AUTO LEASE APPLICATION MENTIONED ABOVE HAS BEEN APPROVED, SUBJECT TO OUR RECEIPT OF THE FOLLOWING WITH THE DOCUMENTATION PACKAGE:

\* A COPY OF THE APPLICANT(S) DRIVERS LICENSE

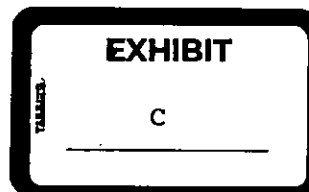
\*

THIS APPROVAL IS GOOD FOR THIRTY DAYS FROM THE DATE OF THIS LETTER.

THANK YOU FOR YOUR BUSINESS. IF ANY QUESTIONS ARISE, PLEASE CALL ME AT THE NUMBER SHOWN.

SINCERELY,  
WILLIAM WOOD  
215-830-3456

PROTHOROTRY'S OFFICE  
FALLS CHURCH  
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J.C.  
PROTHONOTARY'S OFFICE

**EXHIBIT "D"**



INSURANCE BROKERS OF YORK, INC

October 6, 1997

Ms. Stacia Grove  
562 E. Heatherfield Way  
Red Lion, Pa. 17356

RE: Commercial Automobile Insurance

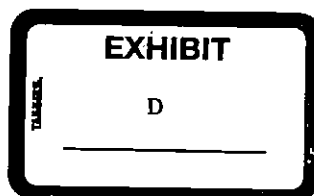
To Whom May Concern,

Please be advised that Ms. Grove has been in constant contact with our office regarding the insurance requirements that are needed for the start up of her limousine business. As soon as Ms. Grove advises our office that she is ready to begin operations, I see nothing standing in the way of her obtaining commercial coverage at that time. Should there be any questions or concerns, feel free to contact our office.

Sincerely,

M. Chris Williams  
Account Executive

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# INSURANCE BROKERS OF YORK, INC.

M. CHRIS WILLIAMS  
ACCOUNT EXECUTIVE

Tuesday, October 14, 1997

To Whom May Concern,

In addition to the letter dated October 6, 1997 from Insurance Brokers Of York, Stacia Grove has received quotations for \$1,500,000 of commercial automobile liability for the start up of her limousine business. Should there be any questions or concerns, feel free to contact our office.

Sincerely,

M. Chris Williams  
Account Executive

97 OCT 14 PM 3:43  
PROTHONOTARY'S OFFICE

1559 RODNEY ROAD  
YORK, PENNSYLVANIA 17404  
PHONE 717-767-5881  
FAX 717-764-5654  
[www.mfiu.com/york](http://www.mfiu.com/york)

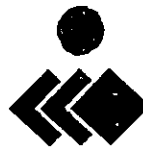
1000000000

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FBI  
PROTHONOTARY'S OFFICE

**EXHIBIT "E"**

E WILLIAM EMSWILER  
OWNER



PRIME TIME AUTO  
2311 SOUTH QUEEN STREET  
YORK, PA 17402  
717-741-3593  
FAX 717-741-3446

AUTO SALES, BROKER & MUSTANG SPECIALTIES

10/8/97

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Re: A-00114058 Stacia H. Grove, t/d/b/a Central Pennsylvania Limousine Service

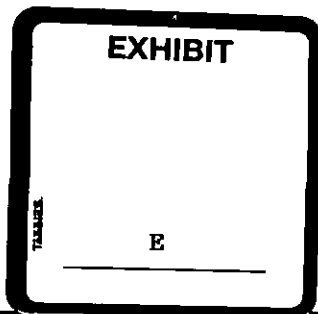
To Whom It May Concern,

Over the past several years, I have owned several limousines for personal use. When driven to my place of business, the vehicle is often parked to the rear or side of my building. It would be very clear for me to say, on average, I would have two or three inquiries per week in reference to the rental of this particular vehicle. After stating that the limousine is not for rent or hire, I would refer the person or persons to the limousines services in the yellow pages of our telephone directory, to which to reply is almost always the same, being that there is not a limousine available in the county. The county I am referring to is York County. The approval of the application of Stacia H. Grove, t/d/b/a Central Pennsylvania Limousine Service, #A-00114058, would be a major asset to the city of York, and also to the entire county. If you would like to speak to me personally, please feel free to contact me at (717) 741-3593 with any questions or concerns.

Sincerely,

E. William Emswiler

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

IN RE: :  
STACIA H. GROVE t/d/b/a : A-00114058  
CENTRAL PENNSYLVANIA :  
LIMOUSINE SERVICE (562 East :  
Heatherfield Way, Red Lion, York :  
County, PA 17356) - persons in :  
limousine service between points in :  
the counties of York, Lancaster, :  
and Dauphin, and from points in the :  
said territory to points in :  
Pennsylvania and return :

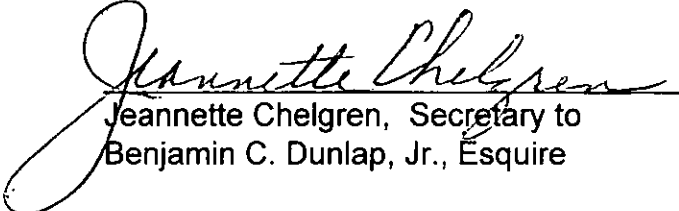
**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing Applicant's Pre-Hearing Memorandum in the above action, this day by **HAND DELIVERY**, addressed to:

**SERVICE LIST**

Scott Pohlman, Esquire  
Robinson & Geraldo  
4407 North Front Street  
P. O. Box 5320  
Harrisburg, PA 17110  
Counsel for Protestants, Salgals, Inc., Superior Transportation  
Services, Inc. t/a Superior Limousine Service, Keystone  
Limousine, Inc., White Rose Limousine, Inc. and  
Unique Limousine Service

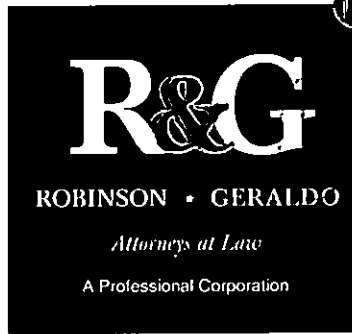
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PA.P.U.C. SECRETARY'S OFFICE

  
Jeannette Chelgren, Secretary to  
Benjamin C. Dunlap, Jr., Esquire

Dated: October 14, 1997

DOCUMENT  
FOLDER

October 16, 1997



ORIGINAL

97 OCT 17 AM 8:56

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PROTHONOTARY'S OFFICE

James McNulty, Prothonotary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

RE: STACIA H. GROVE t/d/b/a Central Pennsylvania Limousine  
Service; A-00114058

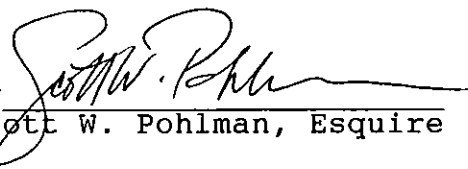
Dear Mr. McNulty:

I have enclosed three copies of a Pre-Hearing Memorandum which was filed with your office on October 14, 1997. At that time only one copy was filed and a second copy was hand delivered to Judge Weismandel. Copies have been provided to all active parties of record.

Please contact our office if you have any questions.

Sincerely yours,

ROBINSON & GERALDO

By   
Scott W. Pohlman, Esquire

SWP:paw

Enclosures

47  
P.O. Box 5320  
Harrisburg, PA 17110-5320

Harrisburg  
4407 North Front Street  
Harrisburg, PA 17110  
(717) 232-8525  
(800) 571-2727

Cumberland County  
17 E. High St., Suite 104  
Carlisle, PA 17013  
(717) 245-9451

Washington, D.C.  
1316 Pennsylvania Ave., S.E.  
Washington, D.C. 20003  
(202) 544-2889

ORIGINAL

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

97 OCT 17 AM 8:57

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A-00114058

IN RE: :  
STACIA H. GROVE t/d/b/a :  
CENTRAL PENNSYLVANIA :  
LIMOUSINE SERVICE (562 East :  
Heatherfield Way, Red Lion, York :  
County, PA 17356) - persons in :  
limousine service between points :  
in the counties of York, Lancaster, :  
and Dauphin, and from points in the :  
said territory to points in :  
Pennsylvania and return :

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REHEARING MEMO OF WHITE ROSE LIMOUSINE INC., SUPERIOR TRANSPORTATION SERVICES, INC. t/a SUPERIOR LIMOUSINE SERVICE, KEYSTONE LIMOUSINE INC., UNIQUE LIMOUSINE SERVICE INC., SALGALS INC. t/d/b/a VILLA LIMOUSINE

PROCEDURAL HISTORY

The applicant Stacia H. Grove t/d/b/a/ Central Pennsylvania Limousine Service ("Applicant") applied for limousine service between points in the counties of York, Lancaster, and Dauphin, and from points in the said territory to points in Pennsylvania and return. The notice of application was printed in the Pennsylvania Bulletin Volume 27, No. 26, June 28, 1997, page 3127. In response to the notice, protests were filed by Superior Transportation Services, Inc. t/a Superior Limousine Service ("Superior"), White Rose Limousine Inc. ("White Rose"), Keystone Limousine Inc. ("Keystone"), Unique Limousine Service Inc. ("Unique"), Salgals Inc. t/d/b/a Villa Limousine ("Villa"), (collectively known as "Protestors"), all of whom are represented by the undersigned counsel and possess certificate authority in the regions applied for.

The notices of protest all contained requests for the names and addresses of supporting witnesses and the names and addresses of the companies they represent and a summary of their testimony. They also requested a current equipment list, including the year, make, and model together with odometer reading(s) of the vehicles to provide the proposed service. It also included a request for financial statements of the applicant, with evidence of the assets and liabilities and start-up capital. To date no information has been provide to protestors pertaining to the applicant.

Counsel for the applicant filed motions to dismiss or strike the protests of all the protestors on August 7, 1997, and served notice thereof on the parties individually and on their counsel via first class mail. Answers to the motions to dismiss or strike were filed on August 18, 1997, with the prothonotary and served upon counsel for the applicant.

The parties have discussed possible amendments which were proposed by protestor's counsel. No amendments have been agreed upon and none were offered by the applicant.

A prehearing conference has been scheduled for Friday, October 17, 1997 at 10:00.

#### ISSUES

Whether sufficient public demand or need for additional limousine service in the requested territories exists and whether the addition of a new limousine service will serve a useful public

purpose. The protestors will also question whether the applicant possesses the technical and financial ability necessary to operate and provide the proposed services.


It is also the opinion of the protestors that a new carrier will endanger and impair the operations of the existing carriers and therefore the application of the applicant is contrary to public policy.

#### WITNESSES and TESTIMONY

At the hearing to be scheduled, Superior will be represented by Ray Bensch, who will testify to the above stated issues affecting his company. Unique will be represented by James Salinger, President, who will testify to the above stated issues affecting his company. Keystone will be represented by Ron Stough, Vice President of Operations, he will testify to the above stated issues affecting his company. Villa and White Rose will be represented by Josephine Salinger, President, she will testify to the above stated issues and their affect on her companies.

Dated: Oct. 14, 1997

ROBINSON & GERALDO

By   
Scott W. Pohlman, Esquire  
Attorney I.D. No. 78004  
4407 North Front Street  
P.O. Box 5320  
Harrisburg, Pennsylvania 17110  
(717) 232-8525

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN RE: :  
STACIA H. GROVE t/d/b/a : A-00114058  
CENTRAL PENNSYLVANIA :  
LIMOUSINE SERVICE (562 East :  
Heatherfield Way, Red Lion, York :  
County, PA 17356) - persons in :  
limousine service between points :  
in the counties of York, Lancaster, :  
and Dauphin, and from points in the :  
said territory to points in :  
Pennsylvania and return :


CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing Prehearing Memorandum in the above action, on October 14, 1997, by facsimile and by depositing the same in the United States mail, postage prepaid, in Harrisburg, Pennsylvania addressed to:

SERVICE LIST

Benjamin C. Dunlap, Jr. Esquire  
NAUMAN, SMITH, SHISSLER & HALL  
200 North Third Street, 18th Floor  
P.O. Box 840  
Harrisburg, PA 17108-0840

ROBINSON & GERALDO

By   
Scott W. Pohlman, Esquire  
Attorney I.D. No. 78004  
4407 North Front Street  
Post Office Box 5320  
Harrisburg, Pennsylvania 17110  
(717) 232-8525

ALJ APPEARANCE SHEET

ALJ Hearing Report

Docket No. A-00114058

Case Name Application of Stacia H. Grove,  
t/d/b/a Central Pennsylvania Limousine Service

Location Harrisburg

Date October 17, 1997

ALJ Weismandel

Reporting Firm Commonwealth Reporting

CHECK THOSE BLOCKS WHICH APPLY:

Prehearing Held  YES  NO

Hearing Held  YES  NO

Testimony Taken  YES  NO

Transcript Due  YES  NO

Hearing Concluded  YES  NO

Further Hearing Needed  YES  NO

Estimated Add'l Days Two (2)

RECORD CLOSED  YES  NO

DATE \_\_\_\_\_

Briefs to be Filed  YES  NO

DATE \_\_\_\_\_

BENCH DECISION  YES  NO

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NOV 12 1997

REMARKS:

Names, Addresses and Telephone Numbers of Parties or Counsel of Record  
PLEASE PRINT CLEARLY

Incomplete Information may Result in Delay of Processing

Name and Telephone Number	Address	Appearing for
James J. Salingen Unique Limousine White Rose Limousine Telephone No. 233-4431 SALGALS Inc	PO Box 60462 City: Hbg State: PA Zip: 17106	DOCUMENT FOLDER
RONALD E. STOUGH Telephone No. 717-892-1240	988 STONY BATTERY RD. KEYSTONE LIMOUSINE City: LANCASTER State: PA Zip: 17601	
RAYMOND BENSCH Superior Limousine Service Telephone No. 939-5560	P.O. Box 122 City: Hershey State: PA Zip: 17033	Superior Transportation Svcs. Inc. t/d/b/a Superior Limousine Svcs.
Scott W. Pohlman, Esq P.O. Box 5320 Harrisburg PA 17110 Telephone No. 717-232-8525	P.O. Box 5320 City: Harrisburg State: PA Zip: 17110	unique limo. Keystone Villa White Rose

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PROT HONORARY

Check this box if additional parties or counsel of record appear on back of form.

*Vicki Santos*  
REPORTER

Name and Telephone Number	Address			Appearing for
Benjamin C. Dunlop, Jr. Neuman, Smith, Shisler & Hill Telephone No. (717) 236-3010	200 N. Third Street P.O. Box 840 City Harrisburg State PA Zip 17108			Stacia Grove
Stacia Grove 562 E. Heatherfield Way Red Lion, Pa 17356 Telephone No. (414) 2469409	City State Zip			
Todd Grove Telephone No.	562 East Heatherfield Way City Red Lion State PA Zip 17356			
Telephone No.	City State Zip			
Telephone No.	City State Zip			
Telephone No.	City State Zip			
Telephone No.	City State Zip			
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