

Raymond D. Bensch, President
Superior Transportation Services, Inc. t/a
Superior Limousine Service 004341
P.O. Box 122
Hershey, Pa. 17033

97 JUL -7 AM 10: 23

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PROTHONOTARY'S OFFICE

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

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JUL 08 1997

In re: Motor carrier application of Stacia H. Grove, t/d/b/a
Central Pennsylvania Limousine Service
Docket No. A-00114058
Protest of Superior Limousine Service

BUREAU OF
TRANSPORTATION & SAFETY

Mr. Alford,

On behalf of Superior Limousine Service, I enclose three copies of a protest to the above captioned application. Copies are being forwarded to the applicant and the applicant's attorney.

Sincerely,

Raymond D. Bensch
June 30, 1997

cc/file

Scott Pohlman, Esq.
Stacia H. Grove
Harry M. Ness

DOCUMENT
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12

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY
COMMISSION

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JUL 08 1997
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IN RE: A-00114058. 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.

FEDERAL BUREAU OF INVESTIGATION
DEPARTMENT OF JUSTICE
OFFICE

Pennsylvania Bulletin reference: Volume 27, No. 26, June 28, 1997, page 3127.

PROTEST OF
SUPERIOR LIMOUSINE SERVICE
Pa. PUC A-00110383

1. The name, address and telephone number of the protestant are:

Superior Transportation Services, Inc.
t/a Superior Limousine Service
P.O. Box 122
Hershey, Pa. 17033
(717)939-5560

2. The name, address, and telephone number of the protestant's attorney are:

Scott Pohlman, Esq.
Robinson & Geraldo
P.O. Box 5320
Harrisburg, Pa. 17110
(717)232-8525

DOCKETED
APPLICATION DOCKET
JUL 08 1997
ENTRY NO. *[Signature]*

3. The protestant possesses authority at Pa. PUC A-00110383, and Pa. PUC A-00110383, Folder 1, Amendment A, copies of which are attached. Thereunder, it may provide service sought by the applicant.

4. Pursuant to Section 333(c) of the Public Utility Code, demand is hereby made upon the applicant to furnish to the protestant;

a) the names and addresses of the supporting witnesses, and the names and addresses of the companies they represent, together with a summary of their testimony,

b) a current equipment list, including year, make, and model, together with odometer reading(s) of the vehicle(s) to be used to provide the proposed service, and

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c) financial statements of the applicant, evidencing the applicant's assets, liabilities, and start-up capital.

These are continuing requests and are applicable to all witnesses to be called, any equipment to be used in the proposed service, and any change in financial position.

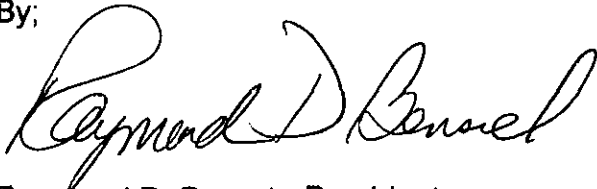
5. The protestant is aware of no amendment which will satisfy its interest, but is willing to discuss.

6. Absent knowledge as to who, if anyone, supports this application, a meaningful traffic exhibit cannot be presented.

Wherefore, the protestant prays the instant application be dismissed.

Superior Limousine Service

By;

A handwritten signature in black ink, appearing to read "Raymond D. Bensch". The signature is written in a cursive, flowing style with a large initial "R".

Raymond D. Bensch, President

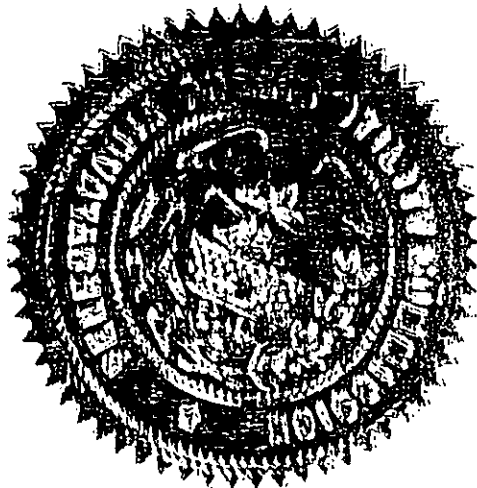
PENNSYLVANIA
PUBLIC UTILITY COMMISSION

IN THE MATTER OF THE APPLICATION OF: A-00110383

RAYMOND D BENSCH, t/d/b/a SUPERIOR LIMOUSINE SERVICE OF HARRISBURG

The Pennsylvania Public Utility Commission hereby certifies that after an investigation and/or hearing, it has, by its report and order made and entered, found and determined that the granting of the application is necessary or proper for the service, accomodation, convenience and safety of the public and hereby issues to the applicant this **CERTIFICATE OF PUBLIC CONVENIENCE** evidencing the Commission's approval of the right to operate as a common carrier.

In Witness Whereof, The PENNSYLVANIA PUBLIC UTILITY COMMISSION has caused these presents to be signed and sealed, and duly attested by its Secretary at its office in the city of Harrisburg this 9th day of DECEMBER, 1992.



John S. Alford

Secretary

A-00110383 RAYMOND D. BENSCH, t/d/b/a SUPERIOR LIMOUSINE SERVICE OF
HARRISBURG (300 Mushroom Hill Road, Swatara, Dauphin County, PA 17111) -
persons in limousine service, between points in the county of Dauphin, and
from points in said county, to points in Pennsylvania, and return; subject to
the following condition: That no right, power or privilege is granted to
provide service to or from the Harrisburg International Airport located in
Lower Swatara Township, Dauphin County: which is to be a transfer of the
rights authorized under the certificate issued at A-00108939 to Raymond D.
and Ronald D. Bensch, Copartners, t/d/b/a Superior Limousine Service of
Harrisburg, subject to the same limitations and conditions.

A-00110383, Folder 1, Am-A RAYMOND D. BENSCH, t/d/b/a SUPERIOR LIMOUSINE SERVICE OF HARRISBURG (300 Mushroom Hill Road, Harrisburg, Dauphin County, PA 17111) - persons in limousine service between points in the county of Dauphin, and from points in said county to points in Pennsylvania, and return; subject to the following condition: That no right, power or privilege is granted to provide service to or from the Harrisburg International Airport in Lower Swatara Township, Dauphin County: SO AS TO PERMIT the transportation of persons in limousine service, between points in the counties of Adams and Perry, and the boroughs of Gratz and Elizabethville, and the townships of East Hanover and West Hanover, Dauphin County to points in Pennsylvania and return; which is to be a transfer of the right authorized under the certificate issued at A-00109491 to Elmer Angelo Soprano, t/d/b/a Elmer Soprano Limousine Service, subject to the same limitations and conditions.

Josephine Salinger, President
White Rose Limousine Inc.
1327 North Duke Street
York, PA 17404

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

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JUL 21 1997
BUREAU OF
TRANSPORTATION & SAFETY

In re: Application of Stacia H. Grove, t/d/b/a Central Pennsylvania Limousine
Service
Docket No. A-00114058
Protest of White Rose Limousine

Mr. Alford,

On behalf of White Rose Limousine, I enclose three copies of a protest to
the above captioned application. Copies are being forwarded to the applicant
and the applicant's attorney.

Sincerely,

Josephine Salinger

Josephine Salinger
7-21-97

DOCUMENT
FOLDER

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY
COMMISSION

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JUL 21 1997

IN RE: A-00114058. 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.

Pennsylvania Bulletin reference: Volume 27, No. 28, June 12, 1997, page 3479.

PROTEST OF
WHITE ROSE LIMOUSINE INC.
Pa. PUC A-00111152

1. The name, address and telephone number of the protestant is:

White Rose Limousine
1327 North Duke Street
York, PA 17404

2. The name, address and telephone number of the protestant's attorney is:

Scott Pohlman, Esq.
Robinson & Geraldo
P.O. Box 5320
Harrisburg, Pa. 17110
(717)232-8525

3. The protestant possesses authority at Pa. PUC A-00111152, a copy of which is attached. Thereunder, it may provide service sought by the applicant.

4. Pursuant to Section 333(c) of the Public Utility Code, demand is hereby made upon the applicant to furnish to the protestant;

a) the names and addresses of the supporting witnesses, and the names and addresses of the companies they represent, together with a summary of their testimony,

b) a current equipment list, including year, make, and model, together with odometer reading(s) of the vehicle(s) to be used to provide the proposed

service, and
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APPLICATION DOCKET
JUL 21 1997
ENTRY No. *ef*

c) financial statements of the applicant, evidencing the applicant's assets, liabilities, and start-up capital.

These are continuing requests and are applicable to all witnesses to be called, any equipment to be used in the proposed service, and any change in financial position.

5. The protestant is aware of no amendment which will satisfy its interest, but is willing to discuss.

6. Absent knowledge as to who, if anyone, supports this application, a meaningful traffic exhibit cannot be presented.

Wherefore, the protestant prays the instant application be dismissed.

White Rose Limousine Inc.

By;

A handwritten signature in cursive script that reads "Josephine Salinger".

Josephine Salinger, President

A-00114058 WHITE ROSE LIMOUSINE INC., (1327 North Duke Street, York, PA 17404) a corporation of the Commonwealth of Pennsylvania - persons, in limousine service, between points in the counties of Adams, Cumberland, Dauphin, Lebanon, and York, and from points in said counties, to points in Pennsylvania, and return; subject to the following conditions: That no right, power or privilege is granted to provide service from the Harrisburg International Airport in the township of Lower Swatara, Dauphin County, to the township of Perry, Dauphin County, or to originate service in the borough of Camp Hill, Cumberland County or the city of Harrisburg, Dauphin County; which is to be a transfer of the right authorized under the certificate issued at A-00114058 to White Rose Limousine Service, Inc., a corporation of the Commonwealth of Pennsylvania, subject to the same limitations and conditions.

James J. Salinger, President
Unique Limousine Service Inc.
1301 North Cameron Street
Harrisburg, PA 17103

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JUL 21 1997

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


BUREAU OF
TRANSPORTATION & SAFETY

In re: Application of Stacia H. Grove, t/d/b/a Central Pennsylvania Limousine
Service
Docket No. A-00114058
Protest of Unique Limousine Service

Mr. Alford,

On behalf of Unique Limousine Service, I enclose three copies of a
protest to the above captioned application. Copies are being forwarded to the
applicant and the applicant's attorney.

Sincerely,


James J. Salinger
7-21-97

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY
COMMISSION

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JUL 21 1997

IN RE: A-00114058. Stacia H. Grove, t/d/b/a Central Pennsylvania Limousine Service (562 East Heatherfield Way, Red Lion, York County, Pa. 17356), Bureau of Transportation & Safety 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.

Pennsylvania Bulletin reference: Volume 27, No. 28, June 12, 1997, page 3479.

PROTEST OF
UNIQUE LIMOUSINE SERVICE INC.
Pa. PUC A-00104709

1. The name, address and telephone number of the protestant is:

Unique Limousine Service
1301 North Cameron Street
Harrisburg, PA 17103

2. The name, address and telephone number of the protestant's attorney is:

Scott Pohlman, Esq.
Robinson & Geraldo
P.O. Box 5320
Harrisburg, Pa. 17110
(717)232-8525

3. The protestant possesses authority at Pa. PUC A-00104709, a copy of which is attached. Thereunder, it may provide service sought by the applicant.

4. Pursuant to Section 333(c) of the Public Utility Code, demand is hereby made upon the applicant to furnish to the protestant;

a) the names and addresses of the supporting witnesses, and the names and addresses of the companies they represent, together with a summary of their testimony,

b) a current equipment list, including year, make, and model, together with odometer reading(s) of the vehicle(s) to be used to provide the proposed service; and

PROTESTANT
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APPLICATION DOCKET
JUL 21 1997
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b) a current equipment list, including year, make, and model, together with odometer reading(s) of the vehicle(s) to be used to provide the proposed service, and

c) financial statements of the applicant, evidencing the applicant's assets, liabilities, and start-up capital.

These are continuing requests and are applicable to all witnesses to be called, any equipment to be used in the proposed service, and any change in financial position.


5. The protestant is aware of no amendment which will satisfy its interest, but is willing to discuss.

6. Absent knowledge as to who, if anyone, supports this application, a meaningful traffic exhibit cannot be presented.

Wherefore, the protestant prays the instant application be dismissed.

Unique Limousine Service Inc.

By;



James J. Salinger, President

A-00104709 UNIQUE LIMOUSINE SERVICE, INC. (3737 North Sixth Street, Harrisburg, Pennsylvania, 17110), a corporation of the Commonwealth of Pennsylvania - persons, in luxury limousine service, in vehicles with a seating capacity of ten (10) passengers or less, excluding the driver, between points in the counties of Dauphin and Cumberland, and from points in said counties, to points in Pennsylvania, and vice versa.

Ronald Stough, Vice President of Operations
Keystone Limousine Inc.
988 Stony Battery Road
Lancaster, PA 17601

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JUL 21 1997

BUREAU OF
TRANSPORTATION & SAFETY

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

In re: Application of Stacia H. Grove, t/d/b/a Central Pennsylvania Limousine
Service
Docket No. A-00114058
Protest of Keystone Limousine

Mr. Alford,

On behalf of Keystone Limousine, I enclose three copies of a protest to
the above captioned application. Copies are being forwarded to the applicant
and the applicant's attorney.

Sincerely,



Ronald Stough, Vice President of Operations
7-21-97

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY
COMMISSION

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JUL 21 1997

IN RE: A-00114058 . 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.

BUREAU OF
TRANSPORTATION & SAFETY

Pennsylvania Bulletin reference: Volume 27, No. 26, June 28, 1997, page 3127.

PROTEST OF
KEYSTONE LIMOUSINE INC
Pa. PUC A-00110279

1. The name, address and telephone number of the protestant is:

Keystone Limousine Inc.
988 Stony Battery Road
Lancaster, PA 17601

2. The name, address and telephone number of the protestant's attorney is:

Scott Pohlman, Esq.
Robinson & Geraldo
P.O. Box 5320
Harrisburg, Pa. 17110
(717)232-8525

3. The protestant possesses authority at Pa. PUC A-00110279, a copy of which is attached. Thereunder, it may provide service sought by the applicant.

4. Pursuant to Section 333(c) of the Public Utility Code, demand is hereby made upon the applicant to furnish to the protestant;

a) the names and addresses of the supporting witnesses, and the names and addresses of the companies they represent, together with a summary of their testimony,

b) a current equipment list, including year, make, and model, together with odometer reading(s) of the vehicle(s) to be used to provide the proposed service, and

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APPLICATION DCKET
JUL 21 1997
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b) a current equipment list, including year, make, and model, together with odometer reading(s) of the vehicle(s) to be used to provide the proposed service, and

c) financial statements of the applicant, evidencing the applicant's assets, liabilities, and start-up capital.

These are continuing requests and are applicable to all witnesses to be called, any equipment to be used in the proposed service, and any change in financial position.

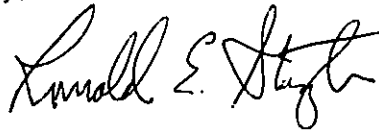
5. The protestant is aware of no amendment which will satisfy its interest, but is willing to discuss.

6. Absent knowledge as to who, if anyone, supports this application, a meaningful traffic exhibit cannot be presented.

Wherefore, the protestant prays the instant application be dismissed.

Keystone Limousine Inc.

By;

A handwritten signature in black ink, appearing to read "Ronald E. Stough". The signature is written in a cursive style with a large initial 'R' and 'S'.

Ronald Stough, Vice President of Operations

CERTIFICATE No. A-00110279, F.2

LIMOUSINE PA: P.U.C. No.1

KEYSTONE LIMOUSINE, INC.

RATES AND RULES
GOVERNING THE
TRANSPORTATION OF

To transport, as a common carrier, persons in limousine service, between points in the counties of Adams, Cumberland, Dauphin, Franklin, Lancaster, Lebanon and York, and from points in said counties to points in Pennsylvania, and Return.

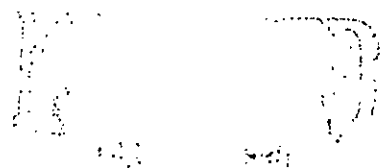
ISSUED: DECEMBER 4, 1996

EFFECTIVE: DECEMBER 5, 1996

ISSUED UNDER AUTHORITY OF PA. CODE, TITLE 52, SECTION 23,42

BY: NANCY J. REYMER, PRESIDENT
KEYSTONE LIMOUSINE, INC.
304 EAST MAIN STREET
MOUNT JOY, PENNSYLVANIA 17552

(717) 653-8141



Trans. Authority

KEYSTONE LIMOUSINE, INC.

COPY

RATES AND RULES
GOVERNING THE
TRANSPORTATION OF

To transport, as a common carrier, persons in airport transfer service, from points in the counties of Lancaster and York, to the following airports: Philadelphia International Airport, in the city and county of Philadelphia, and the township of Tinicum, Delaware County; Harrisburg International Airport, in the township of Lower Swatara, dauphin County; Lancaster Municipal Airport, in the township of Manheim, Lancaster County; and the Reading Municipal Airport in the township of Bern, Berks County.

Issued: January 8, 1993

Effective: January 9, 1993

Issued under authority of Pa. Code, title 52, Section 23.42

By: Ronald E. Stough Vice President
Keystone Limousine, Inc.
228 East Main Street
Mount Joy, Pennsylvania 17552
(717) 653-8143

Josephine Salinger, President
Salgals, Inc. t/d/b/a
Villa Limousine
P.O. Box 60402
Harrisburg, PA 17106

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BUREAU OF
TRANSPORTATION & SAFETY

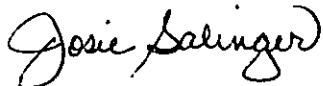
John Alford, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

In re: Application of Stacia H. Grove, t/d/b/a Central Pennsylvania Limousine
Service
Docket No. A-00114058
Protest of Villa Limousine

Mr. Alford,

On behalf of Villa Limousine, I enclose three copies of a protest to the
above captioned application. Copies are being forwarded to the applicant and
the applicant's attorney.

Sincerely,



Josephine Salinger
7-21-97

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FOLDER

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY
COMMISSION

JUL 21 1997

IN RE: A-00114058. 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.

Pennsylvania Bulletin reference: Volume 27, No. 28, June 12, 1997, page 3479.

PROTEST OF
SALGALS INC T/d/b/a Villa Limousine
Pa. PUC A-00110608

1. The name, address and telephone number of the protestant is:

Salgals Inc T/d/b/a Villa Limousine
Capital City Airport
New Cumberland, PA
P.O. Box 60402
Harrisburg, PA 17106

2. The name, address and telephone number of the protestant's attorney is:

Scott Pohlman, Esq.
Robinson & Geraldo
P.O. Box 5320
Harrisburg, Pa. 17110
(717)232-8525

3. The protestant possesses authority at Pa. PUC A-00110608, a copy of which is attached. Thereunder, it may provide service sought by the applicant.

4. Pursuant to Section 333(c) of the Public Utility Code, demand is hereby made upon the applicant to furnish to the protestant;

a) the names and addresses of the supporting witnesses, and the names and addresses of the companies they represent, together with a summary of their testimony,

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APPLICATION DOCKET
JUL 21 1997
ENTRY NO. *[Signature]*

b) a current equipment list, including year, make, and model, together with odometer reading(s) of the vehicle(s) to be used to provide the proposed service, and

c) financial statements of the applicant, evidencing the applicant's assets, liabilities, and start-up capital.

These are continuing requests and are applicable to all witnesses to be called, any equipment to be used in the proposed service, and any change in financial position.

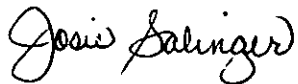
5. The protestant is aware of no amendment which will satisfy its interest, but is willing to discuss.

6. Absent knowledge as to who, if anyone, supports this application, a meaningful traffic exhibit cannot be presented.

Wherefore, the protestant prays the instant application be dismissed.

Salgals Inc. T/d/b/a Villa Limousine

By;

A handwritten signature in cursive script that reads "Josephine Salinger".

Josephine Salinger, President

A-00110608 SALGALS, INC., t/d/b/a VILLA LIMOUSINE SERVICE (P.O. Box 60402, Harrisburg, Dauphin County, PA 17106), a corporation of the Commonwealth of Pennsylvania - persons, in limousine service, between points in York County, and from points in said county, to points in the counties of Adams, Cumberland, Dauphin, Lebanon, and Perry, and vice versa; subject to the following condition: That no right, power or privilege is granted to transport from points in the city of York, and the townships of York, Spring Garden, Manchester, West Manchester and Newberry, York County, to points in the counties of Adams, Cumberland and Dauphin; which is to be a transfer of the right authorized under the certificate issued at A-00105154 to Villa Limousine Service, Inc., a corporation of the Commonwealth of Pennsylvania, subject to the same limitations and conditions.

LAW OFFICES
NAUMAN, SMITH, SHISSLER & HALL

18TH FLOOR
200 NORTH THIRD STREET

P. O. Box 840

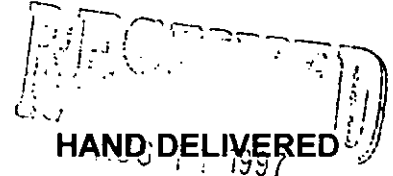
HARRISBURG, PENNSYLVANIA 17108-0840

TELEPHONE
(717) 236-3010
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

August 7, 1997



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

BUREAU OF
TRANSPORTATION & SAFETY

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 the Entry of Appearance of Benjamin C. Dunlap, Jr., Esquire on behalf of Stacia H. Grove for filing in the above matter. In accordance with the accompanying Certificate of Service we have provided copies of the Entry of Appearance to all active parties of record.

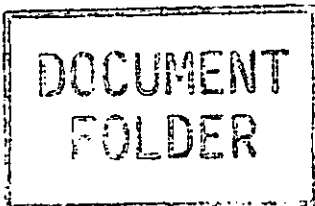
In addition, I enclose the original and nine (9) copies each of a Motion to Dismiss or Strike the Protests Salgals, Inc. t/d/b/a Villa Limousine, Unique Limousine Service, White Rose Limousine, Inc. Keystone Limousine, Inc. and Superior Limousine Service. In accordance with the Certificates of Service, we have provided copies of the Motions to all active parties.

Sincerely yours,

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

/jc
Enclosures
cc: All Parties of Record
Stacia H. Grove

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97 AUG - 7 PM 4: 13
P.A.P.U.C.
PROTHONOTARY'S OFFICE



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

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

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AUG 11 1997

PRAECIPE FOR ENTRY OF APPEARANCE BUREAU OF
TRANSPORTATION & SAFETY

TO: JOHN G. ALFORD
SECRETARY OF PUC

Please enter the appearance of the undersigned as counsel for Stacia H. Grove
t/d/b/a Central Pennsylvania Limousine Service in regard to the above-captioned
proceeding.

NAUMAN, SMITH, SHISSLER & HALL

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

200 North Third Street, 18th 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: August 7, 1997

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DOCKETED
AUG 11 1997
ENTRY No. 29

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

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

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing Praecipe for Entry of Appearance in the above action, this day by depositing the same in the United States mail, postage prepaid, in Harrisburg, Pennsylvania, addressed to:

SERVICE LIST

Salgals, Inc. t/d/b/a Villa
Limousine
Capital City Airport
P. O. Box 60402
Harrisburg, PA 17106

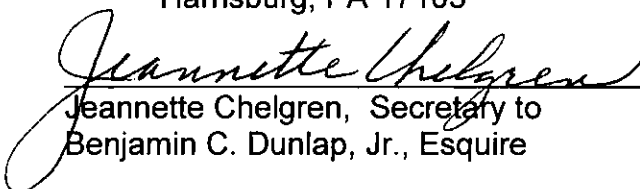
Scott Pohlman, Esquire
Robinson & Geraldo
P. O. Box 5320
Harrisburg, PA 17110

Keystone Limousine, Inc.
988 Stony Battery Road
Lancaster, PA 17601

Superior Transportation Services, Inc.
T/a Superior Limousine Service
P. O. Box 122
Hershey, PA 17033

White Rose Limousine, Inc.
1327 North Duke Street
York, PA 17404

Unique Limousine Service
1301 North Cameron Street
Harrisburg, PA 17103


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

Dated: August 7, 1997

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

REC-110

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

AUG 11 1997
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PENNSYLVANIA PUBLIC UTILITY COMMISSION
PROTECTOR OF PUBLIC SAFETY
HEALTH, SAFETY & ENVIRONMENTAL PROTECTION
OFFICE

**MOTION TO DISMISS OR STRIKE THE PROTEST
OF SUPERIOR TRANSPORTATION SERVICES,
INC. t/a SUPERIOR LIMOUSINE SERVICE**

Pursuant to 52 PA Code § 3.381(c)(3), Stacia H. Grove t/d/b/a Central Pennsylvania Limousine Service ("Grove"), by her attorneys, Nauman, Smith, Shissler & Hall, moves the Pennsylvania Public Utility Commission ("Commission") to dismiss the protest of Superior Transportation Services, Inc. t/a Superior Limousine Service ("Superior"), or in the alternative to strike certain portions of the protest, based upon the following:

1. The protest of Superior to the above application should be dismissed, in that the protest fails to include "a 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), and thus is insufficient as to substance.

2. The protest of Superior to the above application should be dismissed in that it fails to set forth a "statement of any restrictions to the application which would protect the

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APPLICATION DOCKET
AUG 11 1997
ENTRY No. *9*

protestant's interest," as required by 52 PA Code § 3.381(c)(1)(vi), and thus is insufficient as to substance.

3. The protest of Superior to the above application should be dismissed in that it fails to have attached thereto a certificate of service as required by 52 PA Code § 1.57, and thus is insufficient as to form.

4. In the event that the protest of Superior to the above application is not dismissed in its entirety, Grove moves that paragraph 4 of the protest be stricken, in that a protest is an improper means by which to interpose interrogatories and make document requests, rendering the paragraph insufficient as to form and substance.

5. In the event that the protest of Superior to the above application is not dismissed in its entirety and paragraph 4 of the protest is not stricken, Grove objects to subsection (c) of paragraph 4 as requesting privileged information.

6. In the event that the protest of Superior to the above application is not dismissed in its entirety, Grove moves that paragraph 6 of the protest be stricken as an improper averment in a protest, rendering the paragraph insufficient as to form and substance. In addition, information regarding persons supporting Grove's application was attached to the application and is a matter of public record on file with the Commission.

WHEREFORE, Stacia H. Grove t/d/b/a Central Pennsylvania Limousine Service, prays that the protest of Superior Transportation Services, Inc. t/a Superior Limousine Service, be dismissed, or in the alternative, that paragraphs 4 and 6 be stricken in accordance with this motion.

NAUMAN, SMITH, SHISSLER & HALL

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

200 North Third Street, 18th 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: August 7, 1997

**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

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

97 AUG - 7 PM 4: 14

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CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing "Motion to Dismiss or Strike the Protest of Superior Limousine Service" in the above action, this day by depositing the same in the United States mail, postage prepaid, in Harrisburg, Pennsylvania, addressed to:

SERVICE LIST

Superior Limousine Service
P. O. Box 122
Hershey, PA 17033

Scott Pohlman, Esquire
Robinson & Geraldo
P. O. Box 5320
Harrisburg, PA 17110


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

Dated: August 7, 1997

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

RECEIVED
97 AUG -7 PM 4:17
PROTHONOTARY'S OFFICE
AUG 11 1997
BUREAU OF
TRANSPORTATION & SAFETY

**MOTION TO DISMISS OR STRIKE THE PROTEST
OF KEYSTONE LIMOUSINE INC.**

Pursuant to 52 PA Code § 3.381(c)(3), Stacia H. Grove t/d/b/a Central Pennsylvania Limousine Service ("Grove"), by her attorneys, Nauman, Smith, Shissler & Hall, moves the Pennsylvania Public Utility Commission ("Commission") to dismiss the protest of Keystone Limousine Inc. ("Keystone"), or in the alternative to strike certain portions of the protest, based upon the following:

1. The protest of Keystone to the above application should be dismissed, in that the protest fails to include "a 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), and thus is insufficient as to substance.

2. The protest of Keystone to the above application should be dismissed, in that it fails to set forth a "statement of any restrictions to the application which would protect the

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FOLDER

DOCKETED
APPLICATION DOCKET
AUG 11 1997
ENTRY No. *[Signature]*

protestant's interest," as required by 52 PA Code § 3.381(c)(1)(vi), and thus is insufficient as to substance.

3. *The protest of Keystone to the above application should be dismissed in that it fails to have attached thereto a certificate of service as required by 52 PA Code § 1.57, and thus is insufficient as to form.*

4. *The protest of Keystone to the above application should be dismissed in that a copy of the protest was not served upon the applicant, as required by 52 PA Code § 3.381(c)(1), and thus is insufficient as to form.*

5. *In the event that the protest of Keystone to the above application is not dismissed in its entirety, Grove moves that paragraph 4 of the protest be stricken, in that a protest is an improper means by which to interpose interrogatories and make document requests, rendering the paragraph insufficient as to form and substance.*

6. *In the event that the protest of Keystone to the above application is not dismissed in its entirety and paragraph 4 of the protest is not stricken, Grove objects to subsection (c) of paragraph 4 as requesting privileged information.*

7. *In the event that the protest of Keystone to the above application is not dismissed in its entirety, Grove moves that paragraph 6 of the protest be stricken as an improper averment in a protest, rendering the paragraph insufficient as to form and substance. In addition, information regarding persons supporting Grove's application was attached to the application and is a matter of public record on file with the Commission.*

WHEREFORE, Stacia H. Grove t/d/b/a Central Pennsylvania Limousine Service, prays that the protest of Keystone Limousine Inc., be dismissed, or in the alternative, that paragraphs 4 and 6 be stricken in accordance with this motion.

NAUMAN, SMITH, SHISSLER & HALL

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

200 North Third Street, 18th 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: August 7, 1997

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

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

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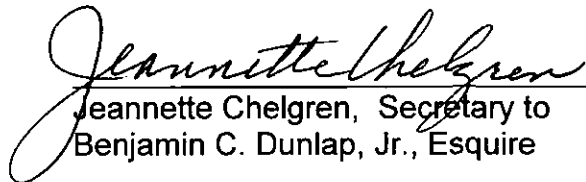
CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing "Motion to Dismiss or Strike the Protest of Keystone Limousine Inc." in the above action, this day by depositing the same in the United States mail, postage prepaid, in Harrisburg, Pennsylvania, addressed to:

SERVICE LIST

Keystone Limousine, Inc.
988 Stony Abattery Road
Lancaster, PA 17601

Scott Pohlman, Esquire
Robinson & Geraldo
P. O. Box 5320
Harrisburg, PA 17110


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

Dated: August 7, 1997

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
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TRANSPORTATION

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

**MOTION TO DISMISS OR STRIKE THE PROTEST
OF SALGALS, INC. T/B/D/A VILLA LIMOUSINE**

Pursuant to 52 PA Code § 3.381(c)(3), Stacia H. Grove t/d/b/a Central Pennsylvania Limousine Service ("Grove"), by her attorneys, Nauman, Smith, Shissler & Hall, moves the Pennsylvania Public Utility Commission ("Commission") to dismiss the protest of Salgals, Inc. t/d/b/a Villa Limousine ("Salgals"), or in the alternative to strike certain portions of the protest, based upon the following:

1. The protest of Salgals to the above application should be dismissed, in that the protest fails to include "a 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), and thus is insufficient as to substance.

2. The protest of Salgals to the above application should be dismissed, in that it fails to set forth a "statement of any restrictions to the application which would protect the

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AUG 11 1997
ENTRY No. 109

76

protestant's interest," as required by 52 PA Code § 3.381(c)(1)(vi), and thus is insufficient as to substance.

3. The protest of Salgals to the above application should be dismissed in that it fails to have attached thereto a certificate of service as required by 52 PA Code § 1.57, and thus is insufficient as to form.

4. The protest of Salgals to the above application should be dismissed in that a copy of the protest was not served upon the applicant, as required by 52 PA Code § 3.381(c)(1), and thus is insufficient as to form.

5. In the event that the protest of Salgals to the above application is not dismissed in its entirety, Grove moves that paragraph 4 of the protest be stricken, in that a protest is an improper means by which to interpose interrogatories and make document requests, rendering the paragraph insufficient as to form and substance.

6. In the event that the protest of Salgals to the above application is not dismissed in its entirety and paragraph 4 of the protest is not stricken, Grove objects to subsection (c) of paragraph 4 as requesting privileged information.

7. In the event that the protest of Salgals to the above application is not dismissed in its entirety, Grove moves to have the Pennsylvania Bulletin reference regarding notice of the application stricken as incorrect and insufficient as to substance.

8. In the event that the protest of Salgals to the above application is not dismissed in its entirety, Grove moves that paragraph 6 of the protest be stricken as an improper averment in a protest, rendering the paragraph insufficient as to form and substance. In

addition, information regarding persons supporting Grove's application was attached to the application and is a matter of public record on file with the Commission.

WHEREFORE, Stacia H. Grove t/d/b/a Central Pennsylvania Limousine Service, prays that the protest of Salgals, Inc. t/d/b/a Villa Limousine, be dismissed, or in the alternative, that paragraphs 4 and 6 and the Pennsylvania Bulletin reference be stricken in accordance with this motion.

NAUMAN, SMITH, SHISSLER & HALL

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

200 North Third Street, 18th 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: August 7, 1997

**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 :

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

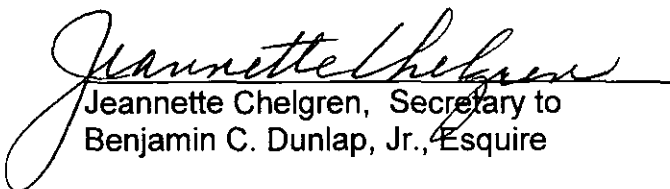
CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing "Motion to Dismiss or Strike the Protest of Salgals, Inc. t/d/b/a Villa Limousine" in the above action, this day by depositing the same in the United States mail, postage prepaid, in Harrisburg, Pennsylvania, addressed to:

SERVICE LIST

Salgals, Inc. t/d/b/a Villa
Limousine
Capital City Airport
P. O. Box 60402
Harrisburg, PA 17106

Scott Pohlman, Esquire
Robinson & Geraldo
P. O. Box 5320
Harrisburg, PA 17110


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

Dated: August 7, 1997

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

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BUREAU OF
TRANSPORTATION & SAFETY
PROTHONOTARY'S OFFICE
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MOTION TO DISMISS OR STRIKE THE PROTEST
OF WHITE ROSE LIMOUSINE INC.

Pursuant to 52 PA Code § 3.381(c)(3), Stacia H. Grove t/d/b/a Central Pennsylvania Limousine Service ("Grove"), by her attorneys, Nauman, Smith, Shissler & Hall, moves the Pennsylvania Public Utility Commission ("Commission") to dismiss the protest of White Rose Limousine Inc. ("White Rose"), or in the alternative to strike certain portions of the protest, based upon the following:

1. The protest of White Rose to the above application should be dismissed, in that the protest fails to include "a 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), and thus is insufficient as to substance.

2. The protest of White Rose to the above application should be dismissed, in that it fails to set forth a "statement of any restrictions to the application which would protect the protestant's interest," as required by 52 PA Code § 3.381(c)(1)(vi), and thus is insufficient

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AUG 11 1997
ENTRY No. *[Signature]*

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as to substance.

3. The protest of White Rose to the above application should be dismissed in that it fails to have attached thereto a certificate of service as required by 52 PA Code § 1.57, and thus is insufficient as to form.

4. The protest of White Rose to the above application should be dismissed in that a copy of the protest was not served upon the applicant, as required by 52 PA Code § 3.381(c)(1), and thus is insufficient as to form.

5. In the event that the protest of White Rose to the above application is not dismissed in its entirety, Grove moves that paragraph 4 of the protest be stricken, in that a protest is an improper means by which to interpose interrogatories and make document requests, rendering the paragraph insufficient as to form and substance.

6. In the event that the protest of White Rose to the above application is not dismissed in its entirety and paragraph 4 of the protest is not stricken, Grove objects to subsection (c) of paragraph 4 as requesting privileged information.

7. In the event that the protest of White Rose to the above application is not dismissed in its entirety, Grove moves to have the Pennsylvania Bulletin reference regarding notice of the application stricken as incorrect and insufficient as to substance.

8. In the event that the protest of White Rose to the above application is not dismissed in its entirety, Grove moves that paragraph 6 of the protest be stricken as an improper averment in a protest, rendering the paragraph insufficient as to form and substance. In addition, information regarding persons supporting Grove's application was attached to the application and is a matter of public record on file with the Commission.

WHEREFORE, Stacia H. Grove t/d/b/a Central Pennsylvania Limousine Service, prays that the protest of White Rose Limousine Inc., be dismissed, or in the alternative, that paragraphs 4 and 6 and the Pennsylvania Bulletin reference be stricken in accordance with this motion.

NAUMAN, SMITH, SHISSLER & HALL

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

200 North Third Street, 18th 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: August 7, 1997

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

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

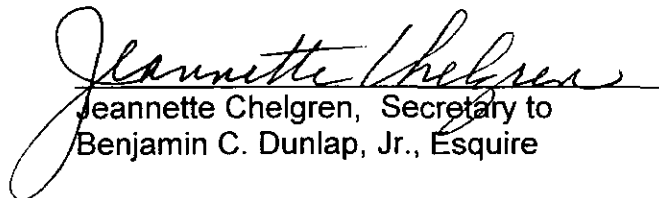
CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing "Motion to Dismiss or Strike the Protest of White Rose Limousine Inc." in the above action, this day by depositing the same in the United States mail, postage prepaid, in Harrisburg, Pennsylvania, addressed to:

SERVICE LIST

White Rose Limousine, Inc.
1327 North Duke Street
York, PA 17404

Scott Pohlman, Esquire
Robinson & Geraldo
P. O. Box 5320
Harrisburg, PA 17110


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

Dated: August 7, 1997

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

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AUG 11 1997

BUREAU OF
TRANSPORTATION & SAFETY

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PROTHONOTARY'S OFFICE

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MOTION TO DISMISS OR STRIKE THE PROTEST
OF UNIQUE LIMOUSINE SERVICE INC.

Pursuant to 52 PA Code § 3.381(c)(3), Stacia H. Grove t/d/b/a Central Pennsylvania Limousine Service ("Grove"), by her attorneys, Nauman, Smith, Shissler & Hall, moves the Pennsylvania Public Utility Commission ("Commission") to dismiss the protest of Unique Limousine Service Inc. ("Unique"), or in the alternative to strike certain portions of the protest, based upon the following:

1. The protest of Unique to the above application should be dismissed, in that the protest fails to include "a 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), and thus is insufficient as to substance.

2. The protest of Unique to the above application should be dismissed, in that it fails to set forth a "statement of any restrictions to the application which would protect the

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AUG 11 1997
ENTRIES INC.

protestant's interest," as required by 52 PA Code § 3.381(c)(1)(vi), and thus is insufficient as to substance.

3. The protest of Unique to the above application should be dismissed in that it fails to have attached thereto a certificate of service as required by 52 PA Code § 1.57, and thus is insufficient as to form.

4. The protest of Unique to the above application should be dismissed in that a copy of the protest was not served upon the applicant, as required by 52 PA Code § 3.381(c)(1), and thus is insufficient as to form.

5. In the event that the protest of Unique to the above application is not dismissed in its entirety, Grove moves that paragraph 4 of the protest be stricken, in that a protest is an improper means by which to interpose interrogatories and make document requests, rendering the paragraph insufficient as to form and substance.

6. In the event that the protest of Unique to the above application is not dismissed in its entirety and paragraph 4 of the protest is not stricken, Grove objects to subsection (c) of paragraph 4 as requesting privileged information.

7. In the event that the protest of Unique to the above application is not dismissed in its entirety, Grove moves to have the Pennsylvania Bulletin reference regarding notice of the application stricken as incorrect and insufficient as to substance.

8. In the event that the protest of Unique to the above application is not dismissed in its entirety, Grove moves that paragraph 6 of the protest be stricken as an improper averment in a protest, rendering the paragraph insufficient as to form and substance. In

addition, information regarding persons supporting Grove's application was attached to the application and is a matter of public record on file with the Commission.

WHEREFORE, Stacia H. Grove t/d/b/a Central Pennsylvania Limousine Service, prays that the protest of Unique Limousine Service Inc., be dismissed, or in the alternative, that paragraphs 4 and 6 and the Pennsylvania Bulletin reference be stricken in accordance with this motion.

NAUMAN, SMITH, SHISSLER & HALL

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

200 North Third Street, 18th 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: August 7, 1997

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

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

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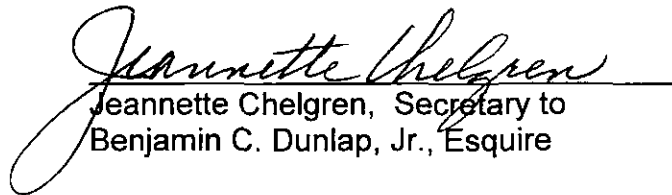
CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing "Motion to Dismiss or Strike the Protest of Unique Limousine Service, Inc." in the above action, this day by depositing the same in the United States mail, postage prepaid, in Harrisburg, Pennsylvania, addressed to:

SERVICE LIST

Unique Limousine Service, Inc.
1301 North Cameron Street
Harrisburg, PA 17103

Scott Pohlman, Esquire
Robinson & Geraldo
P. O. Box 5320
Harrisburg, PA 17110


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

Dated: August 7, 1997

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

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

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RECORDED

ANSWER TO THE MOTION TO DISMISS OR STRIKE
THE PROTEST OF SUPERIOR TRANSPORTATION SERVICES
INC. T/A SUPERIOR LIMOUSINE SERVICE

Pursuant to 52 Pa Code Sec. 5.101(d), Superior Transportation Services, Inc. t/a Superior Limousine Service ("Superior"), by its attorney Scott W. Pohlman, and Robinson & Geraldo, P.C., moves the Pennsylvania Public Utility Commission ("Commission") to deny the motion to dismiss or strike of Stacia H. Grove t/d/b/a Central Pennsylvania Limousine Service ("Grove"), based upon the following:

1. The averment of paragraph 1 is denied. To the contrary paragraph 3 of the protest includes a statement of adverse impact.
2. The averment of paragraph 2 is denied. To the contrary paragraph 5 is a statement of amendments.
3. The averment of paragraph 3 is admitted in part and denied in part. The failure to include a certificate of service has not harmed the applicant, as they have had proper opportunity to respond to the protest and have done so through their motion to dismiss or strike.

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4. The averment of paragraph 4 is denied. Superior made a request for information that is made available to Superior pursuant to 66 Pa.C.S.A. Sec. 333(a), which requires that the information requested be supplied prior to the first hearing.

5. The averment of paragraph 6 is denied. Superior has requested information which is an integral part of establishment of a common carriers ability to function and is to be made available prior to the first hearing.

6. The averment of paragraph 6 is denied. Superior has averred that it is unable to provide a meaningful exhibit until the supporters of this application are known.

WHEREFORE, Superior Transportation Services, Inc. t/a Superior Limousine Service, prays that the protest of Superior Transportation Services, Inc. t/a Superior Limousine Service, be admitted as submitted, and that the motion to dismiss or strike by Stacia H. Grove t/d/b/a Central Pennsylvania Limousine Service be denied in its entirety.

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

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 "Answer to the Motion to Dismiss or Strike the Protest of Superior Limousine Service" in the above action, on August 18, 1997, by depositing the same in the United States mail, postage prepaid, in Harrisburg, Pennsylvania addressed to:

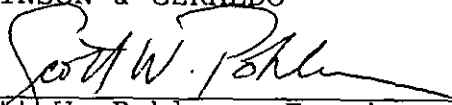
SERVICE LIST

Stacia H. Grove
Central Pennsylvania Limousine Service
562 East Heatherfield Way
Red Lion, PA 17356

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

RECORDED
97 AUG 18 PM 3:24
PROthonotary's OFFICE

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

5. The averment of paragraph 5 is denied. Unique made a request for information that is made available to Unique pursuant to 66 Pa.C.S.A. Sec. 333(a), which requires that the information requested be supplied prior to the first hearing.

6. The averment of paragraph 6 is denied. Unique has requested information which is an integral part of establishment of a common carriers ability to function and is to be made available prior to the first hearing.

7. The averment of paragraph 7 is denied. The Pennsylvania Bulletin reference regarding notice of the application was correct and sufficient as to substance.

8. The averment of paragraph 8 is denied. Unique has averred that it is unable to provide a meaningful exhibit until the supporters of this application are known.

WHEREFORE, Unique Limousine Service Inc., prays that the protest of Unique Limousine Inc. be admitted as submitted, and that the motion to dismiss or strike the protest by Stacia H. Grove t/d/b/a Central Pennsylvania Limousine Inc. be denied in its entirety.

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

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 "Answer to the Motion to Dismiss or Strike the Protest of Unique Limousine Service Inc." in the above action, on August 18, 1997 by depositing the same in the United States mail, postage prepaid, in Harrisburg, Pennsylvania addressed to:

SERVICE LIST

Stacia H. Grove
Central Pennsylvania Limousine Service
562 East Heatherfield Way
Red Lion, PA 17356

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

RECEIVED
91 AUG 18 PM 3:25
PROthonotary's OFFICE

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 :

PROTHONOTARY'S OFFICE

97 AUG 18 PM 3:22

ANSWER TO THE MOTION TO DISMISS OR STRIKE
THE PROTEST OF WHITE ROSE LIMOUSINE INC.

Pursuant to 52 Pa Code Sec. 5.101(d), White Rose Limousine Inc. ("White Rose"), by it's attorney Scott W. Pohlman, and Robinson & Geraldo, P.C., moves the Pennsylvania Public Utility Commission ("Commission") to deny the motion to dismiss or strike of Stacia H. Grove t/d/b/a Central Pennsylvania Limousine Service ("Grove"), based upon the following:

1. The averment of paragraph 1 is denied. To the contrary paragraph 3 of the protest includes a statement of adverse impact.
2. The averment of paragraph 2 is denied. To the contrary paragraph 5 is a statement of amendments.
3. The averment of paragraph 3 is admitted in part and denied in part. The failure to include a certificate of service has not harmed the applicant, as they have had proper opportunity to respond to the protest and have done so through their motion to dismiss or strike.
4. The averment of paragraph 4 is denied. Copies of the protest were mailed to the applicant and their attorney of record.

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AUG 21 1997

126

5. The averment of paragraph 5 is denied. White Rose made a request for information that is made available to White Rose pursuant to 66 Pa.C.S.A. Sec. 333(a), which requires that the information requested be supplied prior to the first hearing.


6. The averment of paragraph 6 is denied. White Rose has requested information which is an integral part of establishment of a common carriers ability to function and is to be made available prior to the first hearing.

7. The averment of paragraph 7 is denied. The Pennsylvania Bulletin reference regarding notice of the application was correct and sufficient as to substance.

8. The averment of paragraph 8 is denied. White Rose has averred that it is unable to provide a meaningful exhibit until the supporters of this application are known.

WHEREFORE, White Rose limousine Inc., prays that the protest of White Rose Limousine Inc. be admitted as submitted, and that the motion to dismiss or strike the protest by Stacia H. Grove t/d/b/a Central Pennsylvania Limousine Inc. be denied in its entirety.

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

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 "Answer to the Motion to Dismiss or Strike the Protest of White Rose Limousine Inc." in the above action, on August 18, 1997 by depositing the same in the United States mail, postage prepaid, in Harrisburg, Pennsylvania addressed to:

SERVICE LIST

Stacia H. Grove
Central Pennsylvania Limousine Service
562 East Heatherfield Way
Red Lion, PA 17356

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 AUG 18 PM 3:22

RECEIVED

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 :

PROTHONOTARY'S OFFICE
1740 N. 3RD ST.
HARRISBURG, PA 17102

97 AUG 18 PM 3:22

RECORDED

ANSWER TO THE MOTION TO DISMISS OR STRIKE
THE PROTEST OF SALGALS INC, t/d/b/a VILLA LIMOUSINE

Pursuant to 52 Pa Code Sec. 5.101(d), Salgals, Inc. t/d/b/a Villa Limousine ("Villa"), by it's attorney Scott W. Pohlman, and Robinson & Geraldo, P.C., moves the Pennsylvania Public Utility Commission ("Commission") to deny the motion to dismiss or strike of Stacia H. Grove t/d/b/a Central Pennsylvania Limousine Service ("Grove"), based upon the following:

1. The averment of paragraph 1 is denied. To the contrary paragraph 3 of the protest includes a statement of adverse impact.
2. The averment of paragraph 2 is denied. To the contrary paragraph 5 is a statement of amendments.
3. The averment of paragraph 3 is admitted in part and denied in part. The failure to include a certificate of service has not harmed the applicant, as they have had proper opportunity to respond to the protest and have done so through their motion to dismiss or strike.
4. The averment of paragraph 4 is denied. Copies of the protest were mailed to the applicant and their attorney of record.

DOCKETED
AUG 21 1997

**DOCUMENT
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125

5. The averment of paragraph 5 is denied. Villa made a request for information that is made available to Villa pursuant to 66 Pa.C.S.A. Sec. 333(a), which requires that the information requested be supplied prior to the first hearing.

6. The averment of paragraph 6 is denied. Villa has requested information which is an integral part of establishment of a common carriers ability to function and is to be made available prior to the first hearing.

7. The averment of paragraph 7 is denied. The Pennsylvania Bulletin reference regarding notice of the application was correct and sufficient as to substance.

8. The averment of paragraph 8 is denied. Villa has averred that it is unable to provide a meaningful exhibit until the supporters of this application are known.

WHEREFORE, Salgals, Inc. t/d/b/a Villa Limousine, prays that the protest of Salgals, Inc. t/d/b/a Villa Limousine be admitted as submitted, and that the motion to dismiss or strike the protest by Stacia H. Grove t/d/b/a Central Pennsylvania Limousine Inc. be denied in its entirety.

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

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 :

PROTHONOTARY'S OFFICE

97 AUG 18 PM 3:22

RECORDED

CERTIFICATE OF SERVICE


I hereby certify that I served the foregoing "Answer to the Motion to Dismiss or Strike the Protest of Salgals, Inc. t/d/b/a Villa Limousine" in the above action, on August 18, 1997 by depositing the same in the United States mail, postage prepaid, in Harrisburg, Pennsylvania addressed to:

SERVICE LIST

Stacia H. Grove
 Central Pennsylvania Limousine Service
 562 East Heatherfield Way
 Red Lion, PA 17356

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

ORIGINAL

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

REP

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

PROTHONOTARY'S OFFICE

97 AUG 18 PM 3:26

RECORDED

ANSWER TO THE MOTION TO DISMISS OR STRIKE
THE PROTEST OF KEYSTONE LIMOUSINE INC.

Pursuant to 52 Pa Code Sec. 5.101(d), Keystone Limousine Inc.
("Keystone"), by it's attorney Scott W. Pohlman, and Robinson &
Geraldo, P.C., moves the Pennsylvania Public Utility Commission
("Commission") to deny the motion to dismiss or strike of Stacia H.
Grove t/d/b/a Central Pennsylvania Limousine Service ("Grove"), based
upon the following:

- 1. The averment of paragraph 1 is denied. To the contrary
paragraph 3 of the protest includes a statement of adverse impact.
2. The averment of paragraph 2, is denied. To the contrary
paragraph 5 is a statement of amendments.
3. The averment of paragraph 3 is admitted in part and denied in
part. The failure to include a certificate of service, has not harmed
the applicant, as they have had proper opportunity to respond to the
protest and have done so through their motion to dismiss or strike.
4. The averment of paragraph 4 is denied. Copies of the protest
were mailed to the applicant and their attorney of record.

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AUG 21 1997

DOCUMENT
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5. The averment of paragraph 5 is denied. Keystone made a request for information that is made available to Keystone pursuant to 66 Pa.C.S.A. Sec. 333(a), which requires that the information requested be supplied prior to the first hearing.

6. The averment of paragraph 6 is denied. Keystone has requested information which is an integral part of establishment of a common carriers ability to function and is to be made available prior to the first hearing.

7. The averment of paragraph 7 is denied. Keystone has averred that it is unable to provide a meaningful exhibit until the supporters of this application are known.

WHEREFORE, Keystone Limousine Inc., prays that the protest of Keystone Limousine Inc. be admitted as submitted, and that the motion to dismiss or strike the protest by Stacia H. Grove t/d/b/a Central Pennsylvania Limousine Service be denied in its entirety.

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

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 "Answer to the Motion to Dismiss or Strike the Protest of Keystone Limousine Inc." in the above action, on August 18, 1997, by depositing the same in the United States mail, postage prepaid, in Harrisburg, Pennsylvania addressed to:

SERVICE LIST

Stacia H. Grove
Central Pennsylvania Limousine Service
562 East Heatherfield Way
Red Lion, PA 17356

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

RECEIVED
97 AUG 18 PM 3:25
PROTHONOTARY'S OFFICE

Law Offices
Harry M. Ness

ORIGINAL

148 North Duke Street
York, Pennsylvania 17401

003209

97 AUG 21 AM 7:58 45-7695

RECEIVED
PROTHONOTARY'S OFFICE

August 20, 1997

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

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

Dear Sir:

Enclosed please find my withdrawal of appearance in the
above-captioned matter.

Very truly yours,

Harry M. Ness
mh

HARRY M. NESS

HMN/mk
Enc.

**DOCUMENT
FOLDER**

COMMONWEALTH OF PENNSYLVANIA
BEFORE

97 AUG 21 AM 10:57

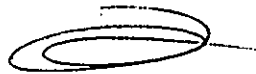
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED
PROTHONOTARY'S OFFICE

In Re:

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

Withdraw my appearance on behalf of the Applicant, Stacia H. Grove, t/d/b/a Central Pennsylvania Limousine Service, in the above-captioned matter.



HARRY M. NESS, ESQ. (23936)
43 N. Duke St.
York, PA 17401
717-845-7695

**DOCUMENT
FOLDER**

DOCKETED
AUG 22 1997



DJf

IN REPLY PLEASE
REFER TO OUR FILE

August 28, 1997

DOCUMENT FOLDER

In Re: A-00114058

(See attached list)

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

For the right to begin to transport, as a common carrier, by motor vehicle, 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.

NOTICE

This is to inform you that a prehearing conference on the above-captioned case will be held as follows:

- Type: **Initial Prehearing Conference**
- Date: **Friday, October 17, 1997**
- Time: **10:00 a.m.**
- Location: **in an available hearing room
Ground Floor
North Office Building
North Street and Commonwealth Avenue
Harrisburg, Pennsylvania**
- Presiding Officer: **Administrative Law Judge Wayne L. Weismandel
P.O. Box 3265
Harrisburg, PA 17105-3265
Telephone: (717) 783-5452**

DOCKETED
AUG 29 1997

RECEIVED
97 AUG 29 AM 9:22
PA.P.U.C.
PROTHONOTARY'S OFFICE

If you are a person with a disability, and you wish to attend the hearing, we may be able to make arrangements for your special needs. Please call Norma Lewis at the Public Utility Commission:

- Scheduling Office: 717-787-1399
- AT&T Relay Service number for persons who are deaf or hearing impaired: 1-800-654-5988.

pc: Judge Weismandel
Norma Lewis
Judy E. Weaver, Scheduling Officer
Beth Plantz
Docket Section
Calendar File