

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

IN RE:           APPLICATION OF                                 : PUC DOCKET  
                  JOEL SICHERMAN t/a                 : NO.: A-2016-2532991  
                  BESTDARNMOVERS                     :

IN RE:           CADDEN BROS. MOVING                             : PUC COMPLAINT DOCKET  
                  AND STORAGE, INC.                     :  
                  And   : NO.: \_\_\_\_\_  
                  MATHESON TRANSFER COMPANY         :  
   :  
                  vs.   :  
                  JOEL SICHERMAN t/a                 :  
                  BESTDARNMOVERS                     :

PA PUC  
SECRETARY'S BUREAU

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**MOTION TO CONSOLIDATE**

AND NOW, comes, Cadden Bros. Moving and Storage, Inc. and Matheson Transfer Company, by their Attorneys, Richard T. Mulcahey, Jr., Schubert, Gallagher, Tyler & Mulcahey, to move pursuant to 52 Pa. Code Section 5.81, to have the above-captioned cases consolidated, and in support thereof, aver:

1. Joel Sicherman t/a BestDarnMovers, ("Applicant"), filed an Application to transport, as a common carrier, by motor vehicle, household goods in use, between points in Pennsylvania, at Docket No. A-2016-2532991.
2. Protests to the Application were filed by Cadden Bros. Moving and Storage, Inc. and Matheson Transfer Company("Protestants").
3. The Application has been assigned to Honorable Cynthia Williams Fordham, ALJ, and an Initial Hearing was held on August 8, 2016. Protestants petition, along with this Motion, to have the record in the matter reopened.
4. Protestants have filed a Formal Complaint against Applicant, along with this Motion, for unlawful transportation rendered by Applicant, which was disclosed during the August

8, 2016 hearing and subsequent unlawful transportation, despite assurances from Applicant to the ALJ that he had ceased and desisted from said unlawful transportation.


5. Protestants are of the opinion that the two matters should be consolidated because both matters directly involve Applicant's lack of fitness as an unlawful operator of a household goods in use common carrier in the Commonwealth of Pennsylvania.

6. Both proceedings will involve common issues of law and fact such that economy of administration of these cases will be best served by hearing evidence from common witnesses during a single proceeding.

7. Consolidation of these matters will not delay the proceedings.

WHEREFORE, Cadden Bros. Moving and Storage, Inc. and Matheson Transfer Company respectfully request the consolidation of the Complaint case and Application case.

Respectfully submitted,

BY:   
RICHARD T. MULCAHEY, JR., ESQ.  
SCHUBERT, GALLAGHER,  
TYLER & MULCAHEY  
Attorneys for Protestants and Complainants  
121 South Broad Street, 20<sup>th</sup> Floor  
Philadelphia, PA 19102-1890  
(215) 587-0107

**CERTIFICATE OF SERVICE**

I, RICHARD T. MULCAHEY, JR., hereby certify that on this date I forwarded, by first-class mail, postage pre-paid, a true and correct copy of the foregoing Motion to Consolidate filed on behalf of Protestants and Complainants, CADDEN BROS. MOVING AND STORAGE, INC. Association, t/a MATHESON TRANSFER COMPANY, to the following parties:

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Honorable Cynthia Williams Fordham, ALJ  
Pennsylvania Public Utility Commission  
801 Market Street, Suite 4063  
Philadelphia, PA 19107

Mr. Joel Sicherman  
t/a BestDarnMovers  
210 Division Street  
Kingston, PA 18704

Date: 8/31/14

  
\_\_\_\_\_  
RICHARD T. MULCAHEY, JR.

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