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May 22, 2019

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

RECEIVED  
2019 MAY 24 AM 10:00  
PA P.U.C.  
SECRETARY'S BUREAU

**Re: Application of Northeastern Movers, Inc.  
PUC Docket No.: A-2019-3009236**

Dear Ms. Chiavetta:

Please be advised that this office represents Cadden Bros. Moving & Storage, Inc. Accordingly, I enclose herewith an original Protest of our client to the above captioned Application.

Kindly acknowledge receipt of the enclosure by time-stamping the enclosed copy of this letter and returning to me in the self-addressed, stamped envelope provided.

Respectfully submitted,

Richard T. Mulcahey, Jr.

RTMJR/hs  
Enclosures

cc: Northeastern Movers, Inc. (w/encls.)  
Cadden Bros. Moving & Storage, Inc. (w/encls.)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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SECRETARY'S BUREAU

IN RE: APPLICATION OF : PUC DOCKET NO.:  
: :  
NORTHEASTERN MOVERS, INC. : A-2019-3009236

**PROTEST**

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

AND NOW, comes Cadden Bros. Moving & Storage, Inc. ("Protestant"), by its attorneys, Richard T. Mulcahey, Jr. of Schubert, Gallagher, Tyler & Mulcahey, and files this Protest to the instant Application and respectfully represents that:

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

Cadden Bros. Moving & Storage, Inc.  
1106 Mid Valley Drive  
Olyphant, PA 18447  
(570) 489-4005

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

Richard T. Mulcahey, Jr., Esquire  
Schubert, Gallagher, Tyler & Mulcahey  
121 South Broad Street, 20<sup>th</sup> Floor  
Philadelphia, PA 19107-4533  
(215) 587-0107

3. Protestant is certificated by Your Honorable Commission at Application Docket No. A-00123871. A copy of the relevant portions of the Protestant's authority upon which its Protest is herein predicated is attached hereto as Exhibit "A" and incorporated by reference herein.

4. Approval of the Application would create unwarranted competition to the detriment of Protestant and other existing carriers and ultimately the public, tending to deprive Protestant and other carriers of customers and to divert revenues which are essential to the maintenance of an

adequate and safe transportation system.

5. Applicant does not possess the technical and financial ability to provide the proposed service and lacks a propensity to operate safely and legally and, therefore, does not have the fitness to be granted a Certificate of Public Convenience by Your Honorable Commission. Specifically:

(a) Applicant has not shown or demonstrated that it possesses the pertinent terminal facilities and communication network for the proposed service.

(b) Applicant has not shown or demonstrated that it has pertinent equipment and vehicles for the proposed service.

(c) Applicant has not shown or demonstrated that it possesses the pertinent safety program for the proposed service or that it will be able obtain a satisfactory safety rating.

(d) Applicant has not shown or demonstrated that it has the pertinent financial wherewithal to operate the proposed service.

(e) Applicant has not shown or demonstrated that it has a minimum of two (2) years experience with a licensed household goods carrier or the equivalent necessary for successful new operations.

Respectfully submitted,

By:   
RICHARD T. MULCAHEY, JR.  
SCHUBERT, GALLAGHER,  
TYLER & MULCAHEY  
Attorneys for Protestant

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**Cadden Bros. Moving & Storage, Inc.**  
**PUC Docket No. A-00123871**

To transport, as a common carrier, household goods in use, between points in the Commonwealth of Pennsylvania.

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**EXHIBIT "A"**

**CERTIFICATE OF SERVICE**

I, Richard T. Mulcahey, Jr., Esquire, hereby certify that on May 22, 2019, I forwarded by first-class mail, postage pre-paid, a copy of the Protest filed on behalf of Cadden Bros. Moving & Storage, Inc. to:

Northeastern Movers, Inc.  
105 West Market Street  
Scranton, PA 18508

DATE: 5/22/19

  
RICHARD T. MULCAHEY, JR., ESQ.

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SCHUBERT ♦ GALLAGHER

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TYLER ♦ MULCAHEY

PHILADELPHIA, PA 19107-4533

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