

**DATE OF DEPOSIT**

**JAN 18 2024**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU**

**IN RE:           APPLICATION OF                               :**     **PUC DOCKET NO.**  
**TC MOVING LLC                           :**     **A-2023-3044717**  
**:**     **Attorney I.D. 12189**

**PROTEST**

**TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:**

**AND NOW, comes Adam Meyer Moving & Storage Co. (Protestant) by their attorney, William H. R. Casey, and files this Protest to the instant Application and respectfully represents that:**

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

Adam Meyer Moving & Storage Co., A93367  
824 Jennings Street  
Bethlehem, PA 18017  
610 867 2121

2. Protestant is certificated by Your Honorable Commission at the above stated Docket number and has statewide Pennsylvania household moving and storage rights

3. Approval of the Application would create unwarranted competition to the detriment of Protestants 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.

4. 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 has pertinent equipment and vehicles for the proposed service.
- (b) Applicant has not shown or demonstrated that it possesses the pertinent safety program for the proposed service or that it will be able to obtain a satisfactory safety rating.
- (d) Applicant has not shown or demonstrated that it has pertinent financial wherewithal to operate the proposed service. He has only \$2,900.00 in cash on hand.
- (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 for successful new operations.
- (f) Applicant has failed to maintain records of his operations.
- (g) Applicant has not complied with insurance requirements.

Respectfully submitted,

By: *William H. R. Casey*  
WILLIAM H. R. CASEY, ESQUIRE  
Attorney for Protestant  
99 East Court Street  
Doylestown, PA 18901  
215 348 7300  
caseyesq@verizon.net

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VERIFICATION TO PROTEST

I, William H.R. Casey hereby verify that the statements made in the foregoing document are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.

Date:

1-18-2024

William H.R. Casey, Esq.

**Certificate of Service: (52 Pa. Code Section 1.58)**

I certify that I have this day served a true copy of my Protest on the following: (list names and addresses of those served by first class mail)

TC MOVING LLC  
1411 MAIN ST., APT C  
BATH, PA 18014

Date: This day 18<sup>th</sup> of JANUARY, 2024

William H. Casey, Esq.  
(Original Signature of **Protestant**)  
*attorney*

**HOW TO FILE**

To file your Protest with the PUC, mail the completed form (along with any attachments) to the addresses listed below:

Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Commonwealth Keystone Building  
Harrisburg, Pennsylvania 17120

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We recommend using overnight delivery service to ensure timely filing.

You may also eFile your Protest by going to the Commission's website at www.puc.pa.gov and visiting our eFiling page. You must open an eFiling account (free of charge) and follow instructions.

If you have any questions about filling out this form, please contact the Secretary's Bureau at 717-772-7777.

Keep a copy of this filing for your records.

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**WILLIAM H. R. CASEY**  
ATTORNEY AT LAW  
99 EAST COURT STREET  
DOYLESTOWN, PENNSYLVANIA 18901

**RECEIVED**

**JAN 22 2024**

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Secretary  
Pennsylvania Public Utilities Commission  
400 North Street  
Commonwealth Keystone Building  
Harrisburg, PA 17120

**Retail**



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