

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

IN RE:	APPLICATION OF	:	PUC DOCKET NO.
	LIAN'S MOVERS LLC	:	A-2026-3060275
		:	Attorney I.D. 12189

PROTEST

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

AND NOW, comes Adam Meyer Moving and Storage Co., Glose moving and Storage t/a O'Briens moving and Storage Co., and Valley Wide Movers, LLC., (Protestants) 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 Protestants are:

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

Glose Moving and Storage t/a O'Briens Moving and Storage Company
7066 Snowdrift Rd
Allentown, PA 18106
610 391 8300
PUC #A-00094076

Valley Wide Movers, LLC
1721 William Street
Hellertown, PA 18055
PUC # 8918518

2. Protestants are certificated by your Honorable Commission at the above stated Docket numbers and have 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

Protestants 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 the 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.
 - c. Applicant has not shown or demonstrated that it has pertinent financial wherewithal to operate the proposed service. He has only \$40,000 in cash on hand.
 - d. 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.
 - e. Applicant has failed to maintain records of his operations which have occurred in violation of his Application.
 - f. Applicant has not complied with insurance requirements.

Respectfully submitted,



By: WILLIAM H. R. CASEY, ESQUIRE

Attorney for Protestants

99 East Court Street

Doylestown, PA 18901

215 348 7300

caseyesq@verizon.net

VERIFICATION

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: 3-19-24

William H.R. Casey

LIAN'S MOVERS, LLC

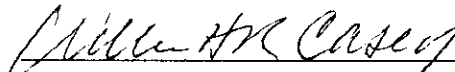
A-2026-3060275

CERIFICATE OF SERVICE

I certify that I have this day served a true copy of my Protest on the following by First Class mail:

LIAN'S MOVERS, LLC
4031 KILMER AVENUE
ALLENTOWN, PA 18104

Date: This day 19th of MARCH, 2026.



William H. R. Casey, Esquire