STATE OF SOUTH CAROLINA

(Caption of Case)

Application of U-Haul Co. of South Carolina, Incorporated for a Class E (Household Goods) Certificate of Public Convenience and Necessity for the Operation of a Motor Vehicle Carrier

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET NUMBER: 2009 - 141 - T

(Please type or print)

Submitted by: John J. Pringle, Jr
Address: P.O. Box 2285
Columbia, SC 29202

SC Bar Number: 11208
Telephone: 803-343-1270
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Other:
Email: jpringle@ellislawhorne.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
☐ Electric	☐ Affidavit	☐ Letter	☐ Request
☐ Electric/Gas	☐ Agreement	☐ Memorandum	☐ Request for Certificatio
☐ Electric/Telecommunications	☐ Answer	☐ Motion	☐ Request for Investigation
☐ Electric/Water	☐ Appellate Review	☐ Objection	☐ Resale Agreement
☐ Electric/Water/Telecom.	☐ Application	☐ Petition	☐ Resale Amendment
☐ Electric/Water/Sewer	☐ Brief	☐ Petition for Reconsideration	☐ Reservation Letter
☐ Gas	☐ Certificate	☐ Petition for Rulemaking	☐ Response
☐ Railroad	☐ Comments	☐ Petition for Rule to Show Cause	☐ Response to Discovery
☐ Sewer	☐ Complaint	☐ Petition to Intervene	☐ Return to Petition
☐ Telecommunications	☐ Consent Order	☐ Petition to Intervene Out of Time	☐ Stipulation
☒ Transportation	☒ Discovery	☐ Prefiled Testimony	☐ Subpoena
☐ Water	☐ Exhibit	☐ Promotion	☐ Tariff
☐ Water/Sewer	☐ Expedited Consideration	☐ Proposed Order	☐ Other:
☐ Administrative Matter	☐ Interconnection Agreement	☐ Protest	
☐ Other:	☐ Interconnection Amendment	☐ Publisher's Affidavit	
	☐ Late-Filed Exhibit	☐ Report	

ELLIS : LAWHORNE

John J. Pringle, Jr.
Direct dial: 803/343-1270
jpringle@ellislawhorne.com

December 1, 2009

VIA FIRST CLASS MAIL
Mr. Tim White
Reads Moving Systems of Carolina
1072 Dropoff Drive
Summerville, SC, 29483

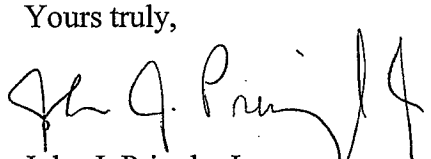
RE: Application of U-Haul Co. of South Carolina, Incorporated for a Class E (Household Goods) Certificate of Public Convenience and Necessity for the Operation of a Motor Vehicle Carrier
Docket No. 2009-141-T, Our File No. 2054-11673

Dear Mr. White:

Enclosed herewith for service, please find **U-Haul Co. of South Carolina, Incorporated's Interrogatories – Set No. 1 and Requests for Production – Set No. 1, served upon Reads Moving Systems of Carolina** in the above-referenced docket.

With kind regards, I am

Yours truly,



John J. Pringle, Jr.

JJP/cr
Enclosures (as stated)
cc: The Honorable Charles L. A. Terreni (via electronic mail service)
Jeffrey M. Nelson, Esquire (via electronic mail service)
Mr. Thomas Tollison (via electronic mail service)
All parties of record (via first-class mail service)

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2009-141-T

Application of U-Haul Co. of South Carolina, Incorporated for a Class E (Household Goods) Certificate of Public Convenience and Necessity for the Operation of a Motor Vehicle Carrier	)	**INTERROGATORIES – SET NO. 1**

TO: Tim White, Reads Moving Systems of Carolina:

Pursuant to the Commission's Rules of Practice and Procedure, the Applicant, U-Haul Co. of South Carolina, Incorporated ("U-Haul") propounds the following Interrogatories to Reads Moving Systems of Carolina ("Reads") and requests responses within twenty (20) days as allowed by the Commission's Rules and Regulations:

IT IS HEREIN REQUESTED:

A. That all information shall be provided to the undersigned in the format as requested.

B. That all responses to the below Interrogatories shall be labeled using the same numbers as used herein.

C. That if the requested information is found in other places or in other exhibits, reference not be made to those, but, instead, that the information be reproduced and placed in the responses to these Interrogatories in the appropriate sequence.

D. That any inquiries or communication relating to questions concerning clarifications of the data requested below be directed to the undersigned.

E. That any exhibits be reduced to an 8 1/2" x 11" format.

F. That, in addition to the signature and verification at the close of each response, the individual responsible for the information contained in each answer be also identified.

G. That each Interrogatory be reproduced at the beginning of the response thereto.

H. That three (3) copies of the responses to these Interrogatories be provided to the undersigned as soon as possible.

I. If the response to any Interrogatory is that the information requested is not currently available, state when the information requested will become available.

J. These Interrogatories shall be deemed continuing so as to require you to supplement or amend your responses as any additional information becomes available up to and through the date of the hearing.

K. If a privilege not to answer is claimed, identify each matter as to which the privilege is claimed, the nature of the privilege, and the legal and factual basis for each such claim.

L. If a refusal to answer an interrogatory is stated on the grounds that same would be unduly burdensome, identify the number and nature of documents needed to be searched, the location of the documents, and the number of man hours and costs required to conduct the search.

M. Answer each interrogatory on the basis of your entire knowledge, including information in the possession of Reads, its officers, directors, members, employees, consultants, representatives, agents, attorneys, subsidiaries, and subcontractors.

N. If any interrogatory cannot be answered in full, answer to the extent possible and specify reasons for inability to answer.

DEFINITIONS

1. AS USED HEREIN, "APPLICANT" SHALL MEAN U-HAUL CO. OF SOUTH CAROLINA, INCORPORATED, WITH THEIR EMPLOYEES, AGENTS, CONSULTANTS, EXPERTS, PARENTS, SUBSIDIARIES, AFFILIATES, AND PARTNER COMPANIES AND OTHER OPERATIONAL OR FUNCTIONAL UNITS AND ALL OFFICERS, DIRECTORS, EMPLOYEES, AGENTS AND REPRESENTATIVES OF THESE ENTITIES. IT ALSO INCLUDES ALL OTHER PERSONS ACTING ON BEHALF OF APPLICANT.

2. AS USED HEREIN, "READS" SHALL MEAN READS MOVING SYSTEMS OF CAROLINA, WITH THEIR EMPLOYEES, AGENTS, CONSULTANTS, EXPERTS, PARENTS, SUBSIDIARIES, AFFILIATES, AND PARTNER COMPANIES AND OTHER OPERATIONAL OR FUNCTIONAL UNITS AND ALL OFFICERS, DIRECTORS, EMPLOYEES, AGENTS AND REPRESENTATIVES OF THESE ENTITIES. IT ALSO INCLUDES ALL OTHER PERSONS ACTING ON BEHALF OF READS.

3. PLEASE CONSTRUE "AND" AS WELL AS "OR" EITHER DISJUNCTIVELY OR CONJUNCTIVELY AS NECESSARY TO BRING WITHIN THE SCOPE OF THESE INTERROGATORIES ANY INFORMATION WHICH MIGHT OTHERWISE BE CONSTRUED OUTSIDE THEIR SCOPE.

4. "DOCUMENT" SHALL MEAN ANY WRITTEN, PRINTED, TYPED, RECORDED, PHOTOGRAPHIC OR OTHER GRAPHIC MATTER OF ANY KIND OR NATURE, AND ALL MECHANICAL AND ELECTRICAL SOUND RECORDINGS AND ANY TRANSCRIPTS THEREOF, AND COMPUTER DATA FILES IN YOUR POSSESSION, CUSTODY, AND/OR CONTROL, OR KNOWN BY YOU TO EXIST; IT SHALL ALSO MEAN ALL COPIES OF DOCUMENTS BY WHATEVER MEANS MADE.

5. "IDENTIFY" OR "IDENTITY" USED WITH REFERENCE TO AN INDIVIDUAL MEANS TO STATE HIS OR HER FULL NAME, PRESENT OR LAST KNOWN ADDRESS, PRESENT OR LAST KNOWN POSITION AND BUSINESS AFFILIATION, AND EMPLOYER, TITLE, AND POSITION AT THE TIME IN QUESTION. IF THE PERSON WAS AN OFFICER, DIRECTOR, TRUSTEE, COMMISSIONER, OR EMPLOYEE OF READS, ALSO STATE THE JOB TITLE AND AREAS OF RESPONSIBILITY.

6. "IDENTIFY" OR "IDENTITY" USED WITH REFERENCE TO A WRITING MEANS TO STATE THE DATE, AUTHOR, TYPE OF DOCUMENT (E.G. LETTER, MEMORANDUM, TELEGRAM, CHART, NOTE APPLICATION, ETC.) OR OTHER MEANS OF IDENTIFICATION, AND ITS PRESENT LOCATION OR CUSTODIAN. IF ANY SUCH DOCUMENT IS NO LONGER IN READ'S POSSESSION OR SUBJECT TO THEIR CONTROL, STATE WHAT DISPOSITION WAS MADE OF IT.

7. "YOU" AND "YOURS" INCLUDES READS, AS DEFINED HEREIN, AND ANY OF ITS MEMBERS, INDIVIDUALLY, WHO HAVE KNOWLEDGE OR CONTROL OF INFORMATION REQUESTED IN THE INTERROGATORY.

8. "COMPANY" SHALL MEAN READS.

INTERROGATORIES

INTERROGATORY 1: Give the names and addresses of all intended witnesses you intend to present at the hearing in this Docket, their official titles, and the issues about which the witness is expected to testify. Please indicate whether or not written or recorded statements have been taken from the witnesses and indicate who has possession of such statements.

INTERROGATORY 2: For each person known to you to be a witness concerning the facts of the case, set forth either a summary sufficient to inform the other party of the important facts known to or observed by such witness, or provide a copy of any written or recorded statements taken from such witnesses.

INTERROGATORY 3: Set forth a list of photographs, plats, sketches, or other prepared documents in your possession that relate to this case.

INTERROGATORY 4: State the names and addresses of all officers, directors and stockholders of your Company; the percentage of ownership of each stockholder; and identify any owner of the Company who also possesses an ownership interest in any other carrier possessing authority to transport commodities in the State of South Carolina with identification of such carrier, the type commodities transported by such carrier and, if commodities transported are similar or identical to those the subject of the Applicant.

INTERROGATORY 5: Identify all portable storage container services that your Company makes available to its customers in the State of South Carolina.

INTERROGATORY 6: Identify the portion of your Company's tariff or rate sheet that contains the rates, terms, and conditions for any portable storage container services provided by your Company in the State of South Carolina.

INTERROGATORY 7: State the number and type of each vehicle presently operated by your Company to provide portable storage container services in the State of South Carolina.

INTERROGATORY 8: Identify any and all economic studies or traffic studies prepared by, or in the possession and control of, your Company which demonstrate the effects of the granting of the application in this proceeding.

INTERROGATORY 9: Please identify all interstate and intrastate motor carrier certificates of authority issued to your Company or under which your Company conducts motor carrier operations, including the date of issuance/and the issuing jurisdictional agency.

INTERROGATORY 10: Please identify all proceedings before the South Carolina Public Service Commission initiated in the last ten (10) years in which your Company or its principals have either presented evidence or been a party to.

[signature page to follow]

ELLIS, LAWHORNE & SIMS, P.A.

John J. Pringle, Jr.
1501 Main Street, 5th Floor
P.O. Box 2285
Columbia SC 29202
Tel.: (803) 343-1270
Fax: (803) 799-8479

Attorneys for U-Haul Co. of South Carolina, Incorporated

December 1, 2009
Columbia, South Carolina

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2009-141-T

Application of U-Haul Co. of South Carolina, Incorporated for a Class E (Household Goods) Certificate of Public Convenience and Necessity for the Operation of a Motor Vehicle Carrier	))))))	**REQUESTS FOR PRODUCTION SET NO. 1**

TO: Tim White, Reads Moving Systems of Carolina:

Pursuant to the Commission's Rules of Practice and Procedure, the Applicant, U-Haul Co. of South Carolina, Incorporated ("U-Haul") propounds the following Requests for Production to Reads Moving Systems of Carolina ("Reads") and requests responses within twenty (20) days as allowed by the Commission's Rules and Regulations:

IT IS HEREIN REQUESTED:

A. That all information shall be provided to the undersigned in the format as requested.

B. That all responses to the below Requests for Production shall be labeled using the same numbers as used herein.

C. That if the requested information is found in other places or in other exhibits, reference not be made to those, but, instead, that the information be reproduced and placed in the responses to these Requests for Production in the appropriate sequence.

D. That any inquiries or communication relating to questions concerning clarifications of the data requested below be directed to the undersigned.

E. That any exhibits be reduced to an 8 1/2" x 11" format.

F. That, in addition to the signature and verification at the close of each response, the individual responsible for the information contained in each answer be also identified.

G. That each Request for Production be reproduced at the beginning of the response thereto.

H. That three (3) copies of the responses to these Requests for Production be provided to the undersigned as soon as possible.

I. If the response to any Request for Production is that the information requested is not currently available, state when the information requested will become available.

J. These Requests for Production shall be deemed continuing so as to require you to supplement or amend your responses as any additional information becomes available up to and through the date of the hearing.

K. If a privilege not to answer is claimed, identify each matter as to which the privilege is claimed, the nature of the privilege, and the legal and factual basis for each such claim.

L. If a refusal to answer a Request for Production is stated on the grounds that same would be unduly burdensome, identify the number and nature of documents needed to be searched, the location of the documents, and the number of man hours and costs required to conduct the search.

M. Answer each Request for Production on the basis of your entire knowledge, including information in the possession of Reads, its officers, directors, members, employees, consultants, representatives, agents, attorneys, subsidiaries, and subcontractors.

N. If any Request for Production cannot be answered in full, answer to the extent possible and specify reasons for inability to answer.

DEFINITIONS

1. AS USED HEREIN, "APPLICANT" SHALL MEAN U-HAUL CO. OF SOUTH CAROLINA, WITH THEIR EMPLOYEES, AGENTS, CONSULTANTS, EXPERTS, PARENTS, SUBSIDIARIES, AFFILIATES, AND PARTNER COMPANIES AND OTHER OPERATIONAL OR FUNCTIONAL UNITS AND ALL OFFICERS, DIRECTORS, EMPLOYEES, AGENTS AND REPRESENTATIVES OF THESE ENTITIES. IT ALSO INCLUDES ALL OTHER PERSONS ACTING ON BEHALF OF APPLICANT.

2. AS USED HEREIN, "READS" SHALL MEAN READS MOVING SYSTEMS OF CAROLINA, WITH THEIR EMPLOYEES, AGENTS, CONSULTANTS, EXPERTS, PARENTS, SUBSIDIARIES, AFFILIATES, AND PARTNER COMPANIES AND OTHER OPERATIONAL OR FUNCTIONAL UNITS AND ALL OFFICERS, DIRECTORS, EMPLOYEES, AGENTS AND

REPRESENTATIVES OF THESE ENTITIES. IT ALSO INCLUDES ALL OTHER PERSONS ACTING ON BEHALF OF READS.

3. PLEASE CONSTRUE "AND" AS WELL AS "OR" EITHER DISJUNCTIVELY OR CONJUNCTIVELY AS NECESSARY TO BRING WITHIN THE SCOPE OF THESE INTERROGATORIES ANY INFORMATION WHICH MIGHT OTHERWISE BE CONSTRUED OUTSIDE THEIR SCOPE.

4. "DOCUMENT" SHALL MEAN ANY WRITTEN, PRINTED, TYPED, RECORDED, PHOTOGRAPHIC OR OTHER GRAPHIC MATTER OF ANY KIND OR NATURE, AND ALL MECHANICAL AND ELECTRICAL SOUND RECORDINGS AND ANY TRANSCRIPTS THEREOF, AND COMPUTER DATA FILES IN YOUR POSSESSION, CUSTODY, AND/OR CONTROL, OR KNOWN BY YOU TO EXIST; IT SHALL ALSO MEAN ALL COPIES OF DOCUMENTS BY WHATEVER MEANS MADE.

5. "IDENTIFY" OR "IDENTITY" USED WITH REFERENCE TO AN INDIVIDUAL MEANS TO STATE HIS OR HER FULL NAME, PRESENT OR LAST KNOWN ADDRESS, PRESENT OR LAST KNOWN POSITION AND BUSINESS AFFILIATION, AND EMPLOYER, TITLE, AND POSITION AT THE TIME IN QUESTION. IF THE PERSON WAS AN OFFICER, DIRECTOR, TRUSTEE, COMMISSIONER, OR EMPLOYEE OF READS, ALSO STATE THE JOB TITLE AND AREAS OF RESPONSIBILITY.

6. "IDENTIFY" OR "IDENTITY" USED WITH REFERENCE TO A WRITING MEANS TO STATE THE DATE, AUTHOR, TYPE OF DOCUMENT (E.G. LETTER, MEMORANDUM, TELEGRAM, CHART, NOTE APPLICATION, ETC.) OR OTHER MEANS OF IDENTIFICATION, AND ITS PRESENT LOCATION OR CUSTODIAN. IF ANY SUCH DOCUMENT IS NO LONGER IN READ'S POSSESSION OR SUBJECT TO THEIR CONTROL, STATE WHAT DISPOSITION WAS MADE OF IT.

7. "YOU" AND "YOURS" INCLUDES READS, AS DEFINED HEREIN, AND ANY OF ITS MEMBERS, INDIVIDUALLY, WHO HAVE KNOWLEDGE OR CONTROL OF INFORMATION REQUESTED IN THE REQUEST FOR PRODUCTION.

8. "COMPANY" SHALL MEAN READS.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION 1: Please identify and provide a copy of any and all summaries or reports prepared by any expert witness relating to this case. To the extent that any such summaries or reports, or the intended evidence of the expert witness, are based on surveys, please provide the following information:

a. A copy of each survey or request for information;

b. A list of the persons to whom such survey or request for information was directed;

c. A description of the methodology for the selection of the persons to whom such survey or request for information was directed;

d. A description of any contact made by, or discussion between any representative of the Applicant and the person (or business) to whom the survey or request for information was directed;

e. A description of all statistical tests conducted with respect to any summary or analysis of the information produced in response to such survey or request for information; and

f. The workpapers for any test described in (e), supra.

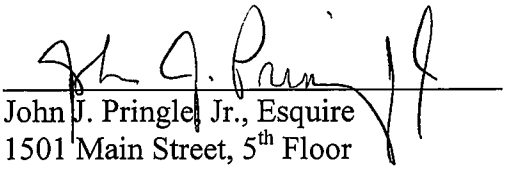
REQUEST FOR PRODUCTION NO. 2: Provide a copy of any and all economic studies or traffic studies prepared by, or in the possession and control of, your Company which demonstrate the effects of the granting of the application in this proceeding, as identified in your response to Interrogatory No. 8.

REQUEST FOR PRODUCT NO. 3: Provide a copy of any and all documents, exhibits or other items of evidence which your Company intends to introduce at any hearing in this proceeding.

REQUEST FOR PRODUCT NO. 4: Please provide copies of any documents that describe any portable storage container services you offer or provide to your customers in South Carolina.

[signature page to follow]

ELLIS, LAWHORNE & SIMS, P.A.



John J. Pringle, Jr., Esquire
1501 Main Street, 5th Floor
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Columbia SC 29202
Tel.: (803) 343-1270
Fax: (803) 799-8479

Attorneys for U-Haul Co. of South Carolina, Incorporated

December 1, 2009
Columbia, South Carolina

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2009-141-T

Application of U-Haul Co. of South Carolina, Incorporated for a Class E (Household Goods) Certificate of Public Convenience and Necessity for the Operation of a Motor Vehicle Carrier	)	**CERTIFICATE OF SERVICE**

This is to certify that I have caused to be served this day, one (1) copy of **U-Haul Co. of South Carolina, Incorporated's Interrogatories – Set No. 1 and Requests for Production – Set No. 1, served upon Reads Moving Systems of Carolina** by placing a copy of same in the care and custody of the United States Postal Service (unless otherwise specified), with proper first-class postage affixed hereto and addressed as follows:

VIA ELECTRONIC MAIL SERVICE

Jeffrey Nelson, Esquire
Office of Regulatory Staff
Legal Department
PO Box 11263
Columbia SC 29211

Mr. Tom Roth
Atlantic Transfer and Storage Company, Incorporated
7370 E. Spartan Boulevard
Charleston, SC, 29418

Mr. Albert H. Kohler
Kohler Moving and Storage, Incorporated
1159 Cainhoy Road
Wando, SC, 29492

Mr. Tim White
Reads Moving Systems of Carolina
1072 Dropoff Drive
Summerville, SC, 29483

Mr. Trey Ingram
Trega, LLC d/b/a Apartment Movers, Etc.
2908-B Maybank Highway
Johns Island, SC, 29455

Carol Roof

Carol Roof
Paralegal

December 1, 2009
Columbia, South Carolina