



October 12, 2016

**FILED ELECTRONICALLY**

The Honorable Jocelyn G. Boyd  
Chief Clerk

**South Carolina Public Service Commission**  
PO Drawer 11649  
Columbia SC 29211

**Attorneys at Law**

Alabama  
Florida  
Louisiana  
Mississippi  
**South Carolina**  
Tennessee  
Texas  
Washington, DC

**John J. Pringle, Jr.**  
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RE: Application of WEB Endeavors, Incorporated d/b/a Two Men and a Truck of Florence for a Class E (Household Goods) Certificate of Public Convenience and Necessity  
**Docket No. 2016-352-T**

Dear Jocelyn:

On behalf of the Applicant, and pursuant to Commission Rule 103-834, I request that the Commission grant Applicant leave to take the deposition of a witness (or witnesses) chosen by the Applicant at a time and place to be agreed upon by the parties in the above-referenced Docket. Any such witness(es) will testify as the Applicant's shipper witness(es), and do so via deposition and in lieu of an appearance at the hearing in this case. Allowing testimony via deposition will accommodate the schedule of any such witness. I have spoken to counsel for the South Carolina Office of Regulatory Staff ("ORS") regarding this request, and the ORS does not object.

The facts that Applicant seeks to establish by deposition are those that support Applicant's application in this Docket: that there is statewide demand for household goods moving services that is not current being met.

The deposition(s) will take place at a time mutually agreed upon by the parties, via telephone or otherwise, at the offices of Adams and Reese LLP, 1501 Main Street, 5<sup>th</sup> Floor, Columbia, South Carolina 29201.

With kind regards, I am

Yours truly,

s/ John J. Pringle, Jr.  
John J. Pringle, Jr.

cc: Jeff Nelson, Esq. (via electronic mail service)  
Mr. Roger Boyer (via electronic mail service)

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2016-352-T**

IN RE: )  
)  
Application of WEB Endeavors, Incorporated. ) **CERTIFICATE OF SERVICE**  
d/b/a Two Men and a Truck of Florence for a )  
Class E (Household Goods) Certificate of Public )  
Convenience and Necessity )

This is to certify that I have caused to be served this day, one (1) copy of Request for Leave to Take Deposition 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**

Jeff Nelson, Esq.  
Office of Regulatory Staff  
Legal Department  
[jnelson@regstaff.sc.gov](mailto:jnelson@regstaff.sc.gov)

s/ John J. Pringle, Jr.  
John J. Pringle, Jr.

October 12, 2016  
Columbia, South Carolina