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2 CA S.B.#193012
3 16000 VENTURA BLVD. STE 908
4 ENCINO, CA 91436
5 818-784-4914

6 ATTORNEY FOR RESPONDENT,
7 GLOBUS MOVING, LLC

DEPARTMENT OF TRANSPORTATION
OFFICE OF COMPLIANCE

2007 JAN 24 AM 10:58

FMCSA-2006-26592-2

8 U.S. DEPARTMENT OF TRANSPORTATION
9 FEDERAL MOTOR CARRIER SAFETY ADMINISTRATION
10 WESTERN SERVICE CENTER

11 In re the NOTICE OF CLAIM against:)

12 GLOBUS MOVING LLC)

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CASE NO. CA-2006-0565-US1226

REPLY TO OBJECTION OF
RESPONDENT RE: HEARING

VIOLATION OF:
49 CFR § 392.9a(a) / 14901(d)(3)
REQUEST FOR HEARING
(49 CFR § 386.14)

PLEASE TAKE NOTICE that Respondent, GLOBUS MOVING, LLC, by and through its attorney, JEFFREY D. NADEL, replies to the OBJECTION of the Field Administrator as follows:

1. Respondent is and was fully insured and registered with the FMCSA during all times and through all relocations of household goods set forth in the Notice of Claim.
2. Respondent requests an evidentiary hearing on the issue of registration and insurance to conduct the relocation services. Respondent would be prejudiced and denied due process without an opportunity to have a hearing on the issue of insurance and registration.

Respectfully submitted,

DATED: January 17, 2007

BY: 
JEFFREY D. NADEL, ESQ.

1 **CERTIFICATION OF SERVICE OF REPLY TO OBJECTION**

2 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

3 I am a resident of the county aforesaid; I am over the age of eighteen years and not a party
4 to the within entitled action; my business address is:

5 16000 Ventura Boulevard, Suite 908 Encino, California 91436

6 On January 17, 2007, I served the within **REPLY TO OBJECTION AND THIS**
7 **CERTIFICATION OF SERVICE**, on the interested parties in said action, by placing a true copy
8 thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States Mail
9 at Encino, California addressed as follows:

10 U.S. DEPT. OF TRANS., DOCKETS
11 400 SEVENTH STREET, SW ROOM PL-401
12 WASHINGTON, DC 20590
13 [ORIGINAL SENT]

14 TERRY D. WOLF, DIVISION ADMINISTRATOR
15 U.S. DEPT. OF TRANS., F.M.C.S.A.
16 1325 "J" ST., STE. 1540
17 SACRAMENTO, CALIFORNIA 95814

18 NANCY JACKSON
19 OFFICE OF CHIEF COUNSEL, F.M.C.S.A.
20 WESTERN SERVICE CENTER
21 12600 W. COLFAX AVE., STE. B-300
22 LAKEWOOD, CO 80215

23 WILLIAM R. PADEN
24 FIELD ADMINISTRATOR, FMCSA
25 WESTERN SERVICE CENTER
26 12600 W. COLFAX AVE., STE. B-300
27 LAKEWOOD, CO 80215

28 I declare that I am employed in the office of a member of the bar of this District at whose
direction the service was made.

Executed on January 17, 2007 at Encino, California.

(To be executed following deposit in the United States Mail)
