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4 Paul J. McGoldrick, #010383
4 Attorney for American Medical Response of Maricopa, LLC

5 **IN THE OFFICE OF THE ADMINISTRATIVE HEARINGS**

6 In the Matter of:)	No. 2015A-EMS-0190-DHS
)	
7 Maricopa Ambulance, LLC)	SUBPOENA DUCES TECUM TO
)	APPLICANT
8 Applicant.)	
)	(Assigned to the Hon. Diane Mihalsky)
)	
)	

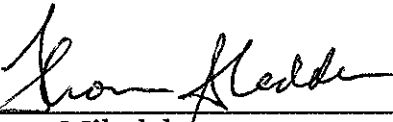
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12 TO: Maricopa Ambulance, LLC and Priority Ambulance
13 c/o James J. Belanger, Esq.
14 Coppersmith Brockelman, PLC
14 2800 N. Central Avenue, Suite 1200
15 Phoenix, Arizona 85004
15 jbelanger@cblawyers.com

16
17 YOU ARE HEREBY COMMANDED TO PRODUCE for inspection and
18 copying the documents identified in the attached **Exhibit 1**. Said production shall take
19 place at the earliest practicable time, but in any event no later than thirty (30) days after
20 service, at the offices of the attorneys for Intervenor American Medical Response of
21 Maricopa, LLC ("AMR"):

22 Paul J. McGoldrick
23 Shorall McGoldrick Brinkmann
24 1232 E. Missouri Avenue
24 Phoenix, Arizona 85014
25 602-230-5429 (phone)
25 paulmgoldrick@smbattorneys.com

1
2 DATED this 27th day of July, 2015.

3
4 By:

5  For
6 Diane Mihalsky
7 Administrative Law Judge

8
9 SUBPOENA ISSUED PURSUANT TO THE REQUEST OF:

10 Paul J. McGoldrick
11 Shorall McGoldrick Brinkmann
12 1232 E. Missouri Avenue
13 Phoenix, Arizona 85014
14 Attorneys for American Medical
15 Response of Maricopa, LLC



1 **EXHIBIT 1**

2 **Documents to be produced:**

3
4 1. All documents regarding the legal formation and operation of
5 Maricopa Ambulance, LLC. This request includes production of articles of
6 incorporation, corporate minutes, operating agreement(s), stock issuance,
7 member list, capital account and prospectus documents.

8 2. All documents relating to or pertaining to the financial capitalization
9 of Maricopa Ambulance, LLC. This request includes promissory notes, checks,
10 wire transfers, bank deposits, pledges, letters of credit, property, capital account
11 funding and loans.

12 3. All documents provided by Maricopa Ambulance, LLC or its
13 attorneys/staff to any non-employee listed as a witness by Maricopa Ambulance,
14 LLC. This request includes emails and documents provided whether the
15 transmission was electronic or via hard copy transmission.

16 4. All documents received by Maricopa Ambulance, LLC or its
17 attorneys/staff from any non-employee listed as a witness by Maricopa
18 Ambulance, LLC. This request includes emails and documents provided whether
19 the transmission was electronic or via hard copy transmission.

20 5. The complete file for each expert witness listed by Maricopa
21 Ambulance, LLC whether the file is kept in an electronic or hard copy.

22 6. All documents, contracts or writings of any type between Maricopa
23 Ambulance, LLC and Nextcare Urgent Care Centers a/k/a Nextcare Holdings
24 relating to the proposed posting of Maricopa Ambulance, LLC ambulances at
25 Nextcare facilities. This request seeks all documents related to the letter dated
26

1 February 10, 2015 from John Julian to Will Humble attached to the application
2 in this matter.

3 7. All documents, contracts or writings of any type Between Maricopa
4 Ambulance, LLC and Nextcare Urgent Care Centers a/k/a Nextcare Holdings
5 relating to the contractual relationship or proposed contractual relationship
6 between the entities as set forth in the letter of February 10, 2015 from John
7 Julian to Will Humble attached to the application in this matter.

8 8. All documents pertaining to alleged "substandard performance" by
9 the American Medical Response of Maricopa, LLC.

10 9. All documents reflecting studies, analyses, data, etc., used or relied
11 on by Maricopa Ambulance, LLC in assessing the potential financial impact upon
12 the American Medical Response of Maricopa, LLC. should the pending
13 application be granted.

14 10. All documents reflecting studies, analysis, data, etc., used or relied
15 on by Maricopa Ambulance LLC in assessing the financial situation and resources
16 of the American Medical Response of Maricopa, LLC.

17 11. All documents reflecting studies, analyses, data, etc., used or relied on
18 by Maricopa Ambulance, LLC in computing and/or evaluating the response times
19 of the American Medical Response of Maricopa, LLC.

20 12. All documents and evidence of the financial backing of Enhanced
21 Equity Funds for Maricopa Ambulance, LLC as set forth in the pending
22 application.

23 13. All service or performance complaints for the last 5 years from or to any
24 regulatory body regarding sub-standard response performance or service
25 performance for the following ambulance companies: Medcorp. Inc., Life
26 Ambulance, First Med EMS, Priority Ambulance (all operational locations

1 including but not limited to Tennessee) ;Shoals Ambulance (Alabama); Seals
2 Ambulance (Indiana); Kunkel/Trans Am Ambulance (New York).

3 14. All documentation regarding matters relating to Bryan Gibson's
4 participation, management or oversight of the wind down, liquidation (pre and
5 post-bankruptcy asset deployment) of FirstMed Corporation.

6 15. All documents produced by Bryan Gibson or his legal counsel pursuant
7 to "Order Directing Production of Documents Under Rule 2004" directed to
8 Bryan Gibson dated May 19, 2015 in Case 13-07673-8-SWH.

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