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IN THE OFFICE OF ADMINISTRATIVE HEARINGS

In the Matter of:

RBR Management LLC, dba Community
Ambulance

Applicant.

Docket No. 2017--EMS-0104-DHS
(EMS No. 0283)

**MARICOPA AMBULANCE INITIAL
LIST OF WITNESSES AND EXHIBITS**

(The Honorable Tammy Eigenheer)

Intervenor, Maricopa Ambulance, LLC, dba Maricopa Ambulance, subject to amendment and supplementation, submits its initial list of witnesses and exhibits as follows. This list is subject to change based on responses to discovery yet to be conducted, including the responses to subpoenas duces tecum to be issued by Maricopa Ambulance:

Witnesses:

Bryan Gibson, Chief Executive Officer, Maricopa Ambulance. Mr. Gibson may testify about, inter alia, the population demographics of the proposed service area; the geographic distribution of health care institutions in the proposed service area; Maricopa Ambulance's response times including Interfacility ("IF") and convalescent response times, rates, and types and levels of proposed service; Maricopa Ambulance's management (including experience, qualifications, and familiarity with Maricopa County); Maricopa Ambulance's personnel (including number and types of personnel, qualifications, scheduling, training, and working conditions); Maricopa Ambulance's ambulances and equipment (including communications equipment, onboard technology,

and other onboard equipment); Maricopa Ambulance's operational aspects; any other aspects of Maricopa Ambulance's proposed service; the potential financial impact of a CON being given to a provider seeking a CON under the terms and conditions proposed by the Applicant and why public necessity and convenience do not require an additional provider under these circumstances; rebuttal testimony to the proposed testimony set forth in the Applicant's initial list of witnesses and exhibits, and Maricopa Ambulance's efforts to reach out and market its services to ground ambulance service consumers in its CON area.

Michelle Angle, Director of Marketing and Business Development, Maricopa Ambulance. Ms. Angle is a marketing and business development expert with 15 years in the health care market. Ms. Angle most recently served as vice president of business development for the international social media network, Quepasa Corporation. Previously, she served for nearly a decade in business development and government relations roles with Arizona ambulance companies Rural/Metro Corporation, PMT Ambulance and American Ambulance. She may testify, inter alia, about the market for ground ambulance services in Maricopa County and in rebuttal to the proposed testimony of Applicant's listed witnesses.

Glenn Leland. Mr. Leland is an executive with Priority Ambulance, Maricopa Ambulance's parent company. Mr. Leland manages business development, sales and marketing for Priority Ambulance. He has more than 35 years of experience in leadership and strategy at national and international EMS companies. Mr. Leland may testify about Maricopa Ambulance's management (including experience, qualifications, and familiarity with Maricopa County); Maricopa Ambulance's personnel (including number and types of personnel, qualifications, scheduling, training, and working conditions); Maricopa Ambulance's ambulances and equipment (including communications equipment, onboard technology, and other onboard equipment); Maricopa Ambulance's operational aspects; any other aspects of Maricopa Ambulance's proposed service; the potential financial impact of a CON being given to a provider seeking a CON under the terms and conditions proposed by the Applicant and why public necessity and convenience do not require an additional provider under these circumstances; and rebuttal testimony to the proposed testimony set forth in the Applicant's initial list of witnesses and exhibits.

Roy Ryals. Mr. Ryals is an emergency medical services consultant. He has been intimately involved in the Arizona ground ambulance services market for years including high level management and operation positions with Rural Metro Corporation and Southwest Ambulance. Mr. Ryals may testify about the population demographics of the proposed service area; the geographic distribution of health care institutions in the proposed service area; Maricopa Ambulance's response times including Interfacility ("IF") and convalescent response times, rates, and types and levels of proposed service;

Maricopa Ambulance's management (including experience, qualifications, and familiarity with Maricopa County); Maricopa Ambulance's personnel (including number and types of personnel, qualifications, scheduling, training, and working conditions); Maricopa Ambulance's ambulances and equipment (including communications equipment, onboard technology, and other onboard equipment); Maricopa Ambulance's operational aspects (including the operations center, posting locations, and deployment,); any other aspects of Maricopa Ambulance's proposed service, the potential financial impact of a CON being given to a provider seeking a CON under the terms and conditions proposed by the Applicant and why public necessity and convenience do not require an additional provider under these circumstances; and rebuttal testimony to the proposed testimony set forth in the Applicant's initial list of witnesses and exhibits.

Rebuttal Expert(s). [to come].

Exhibits

- Analyses of Applicant's *pro forma* ARCR [to come].
- Maricopa Ambulance's admitted exhibits from its CON application hearing.
- Adverse financial impact analyses [to come].
- Response time statistics [to come].
- Mutual Aid Agreements [to come].
- Documents received in response to subpoena duces tecum to the extent relevant and admissible [to come].
- All exhibits listed by Applicant, other Intervenors, and/or ADHS, to the extent relevant and admissible.
- Relevant ADHS Substantive Policy Statements and Agency Guidance Documents (<http://www.azdhs.gov/index.php>)
- List and Maps of CON Holders in Central Arizona (<http://www.azdhs.gov/preparedness/emergency-medical-services-trauma-system/index.php#ambulance-ground-program-con>)
- Exhibits, pleadings and orders from the recent TRO litigation between Dignity Health and AMR Holdco, Inc., et al, CV2017-009481.

Respectfully submitted this 30th day of April, 2018.

JBELANGER LAW PLLC

By /s/ James J. Belanger
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CERTIFICATE OF SERVICE

ORIGINAL filed using the OAH electronic document filing system
<https://portal.azoah.com/oedf> on April 30, 2018, with copies provided to all parties on the
approved mailing list by posting through the designated OAH website at
<https://portal.azoah.com/oedf/documents/2016A-EMS-0381-DHS/2016A-EMS-0381-DHS-0018.pdf>.

/s/ James J. Belanger
