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7 and

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13 *Attorneys for Intervenors – AMR CON Holders*

14 BEFORE THE OFFICE OF ADMINISTRATIVE HEARINGS

15 In the Matter of:)

16 **RBR Management LLC, dba Community**)
17 **Ambulance**)

18 Applicant.)

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

21 **AMR CON HOLDERS' REQUEST**)
22 **FOR HEARING/ORAL ARGUMENT**)
23 **ON THEIR OBJECTIONS TO AND**)
24 **MOTION TO QUASH THE**)
25 **APPLICANT'S SUBPOENA DUCES**)
26 **TECUM**)

(Assigned: The Hon. Tammy Eigenheer)

27 The AMR HoldCo, Inc. affiliates that are Intervenors herein (as modified by
28 Docket No. 53, the April 30, 2018 Notice Withdrawing Interventions of Holders of

1 CONs 46, 66, 75 and 86)¹, hereby request that this Office set a hearing/oral argument
2 on the AMR CON Holders' contemporaneously submitted Objections to/Motion to
3 Quash Applicant's Subpoena Duces Tecum ("SDT"). That SDT requires the
4 production of 61 numbered categories of records and/or information, which including
5 subcategories that are specifically set out (and many of these have subcategories not
6 specifically set out), equals at least 70 different categories of information.² These
7 Intervenors are very concerned about the breadth and intrusiveness of the SDT, and
8 have attempted to summarize their concerns in their Objection/Motion to Quash.
9 However, even that summary required an inordinate number of written pages, which is
10 unlikely to be able to address 100% of the questions or issues this Office might have.
11 Given the importance of the underlying issues, oral argument is respectfully requested.

12 Considering the five business days allowed for responses, it is requested that
13 this Office set the hearing for the first available time after August 3rd.

14 Undersigned counsel has been the primary counsel involved in discussions with
15 client representatives, and in drafting the objections/motion. As such, her physical
16 presence is important. Because she will be traveling from Tucson for the hearing, it is
17 requested that the hearing be scheduled for 10:00 a.m. or later, in order to avoid traffic
18 delays.

19 Likewise, the undersigned is unavailable for the hearing on the following dates
20 due to prior commitments that cannot be rescheduled and requests the hearing not be
21

22 ¹ This leaves American Medical Response of Maricopa (CON 136), Canyon State
23 Ambulance (CON 58), Life Line Ambulance Service (CON 62), Rural/Metro Corp -
24 Maricopa (CON 109), and Professional Medical Transport, Inc. (CON 71), hereafter
"AMR CON Holders".

25 ² On July 13, 2018 RBR withdrew twelve of its numbered items, the withdrawal
26 conditioned upon its ability to obtain the items via the public record, a
contingency that may leave some still at issue.

1 set on these dates (submitted in the hopes of not having to reschedule): August 2 and
2 3, 27 – 31; and September 4 - 7.

3 RESPECTFULLY SUBMITTED this 25th day of July, 2018.

4 **FLETCHER STRUSE FICKBOHM &**
5 **WAGNER, PLC**

6 /s/RONNA FICKBOHM

7 Ronna L. Fickbohm
8 *Attorneys for Intervenor-*
9 *AMR CON Holders*

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13 Pursuant to Case Management
14 Order No. 1, electronic filing and
15 service of the foregoing through
16 <https://portal.azoah.com/oedf/>,
17 has been done this 25th day of July, 2018.

18 By: /s/ Linda Clark