

1 Brendan Murphy, State Bar No. 021947
2 HENDRICKS MURPHY, PLLC
3 3101 North Central Avenue, Suite 970
4 Phoenix, Arizona 85012
5 (602) 604-2104
6 brendan@hendricksmurphy.com

7 Jeffrey Meyerson, State Bar No. 022600
8 THE MEYERSON LAW FIRM, PLC
9 2555 East Camelback Road
10 Suite 140
11 Phoenix, Arizona 85016
12 jeff@themeyersonfirm.com

13 Attorneys for Applicant
14 RBR Management, LLC
15 dba Community Ambulance

16 **IN THE OFFICE OF ADMINSTRATIVE HEARINGS**

17 In the Matter of:

18 RBR Management, LLC dba Community
19 Ambulance,

20 Applicant.

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

**APPLICANT'S
OBJECTIONS TO
MARICOPA AMBULANCE'S
SUBPOENA DUCES TECUM
TO RBR MANAGMENT, LLC**

(Assigned to the Honorable
Tammy L. Eigenheer)

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24 RBR Management LLC, dba Community Ambulance (“Applicant” or
25 “Community Ambulance”), pursuant to AAC R2-19-113, hereby objects, moves to
26 quash, and responds to the subpoena *duces tecum*¹ Maricopa Ambulance caused

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¹ Community Ambulances reserves its rights to amend, revise, supplement its responses and objections as new and/or additional information is discovered.

1 to be issued to Applicant in the above-referenced matter.

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3 **Request No. 1**

4 All documents produced by Applicant in response to any subpoena duces
5 tecum issued by any Intervenor or by ADHS/EMNSTS in this administrative
6 proceeding (2017-EMS-0104-D HS).

7 **Response to Request No. 1**

8 Community Ambulance discloses documents responsive to Request No. 1
9 herewith, and on a rolling basis as documents are received by Applicant.

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11 **Request No. 2**

12 All documents used, considered, or relied on by Applicant to determine that
13 public necessity requires the ground ambulance service to be provided by
14 Applicant if it is awarded a CON.

15 **Response to Request No. 2**

16 Community Ambulance objects to Request No. 2 as overly broad, and
17 premature to the extent it calls for the production of documents that are currently
18 subject to subpoenas issued to Intervenors and Dignity Health. Community
19 Ambulance further objects to Request No. 2 as unduly burdensome to the extent
20 it calls for documents in the possession, custody, and control of Maricopa
21 Ambulance.

22 Subject to and without waiving this objection, Community Ambulance
23 anticipates relying upon documents in the public record, including Intervenors
24 ARCRs (including Maricopa Ambulance) (Exhibits CA44-45, 47,49-50, 52-53, 55-
25 56, 58-59, 61-62, 64, 67-68, 70-71, and currently available 2017 ARCRs for ABC
26 Ambulance and Maricopa Ambulance yet to be disclosed as hearing exhibits) and
27 Maricopa County census data (Exhibit CA-150), as well as well as documents
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1 produced by Intervenors and Dignity Health in response to the currently pending
2 subpoenas. Community Ambulance reserves its right to supplement its response
3 and disclose documents responsive to Request No. 3 on a rolling basis up to and
4 including the deadline for final exhibit disclosures.

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6 **Request No. 3**

7 All documents used, considered, or relied on by Applicant to determine that
8 existing CON holders, including but not limited to Maricopa Ambulance, are not
9 fully meeting public need for ground ambulance services in Applicant's proposed
10 service area.

11 **Response to Request No. 3**

12 Community Ambulance objects to Request No. 3 as overly broad,
13 duplicative of Request No. 2, and premature to the extent it calls for the
14 production of documents that are currently subject to subpoenas issued to
15 Intervenors (including Maricopa Ambulance) and Dignity Health. Community
16 Ambulance cannot produce documents responsive to Request No. 3 until it has
17 received responses to its subpoenas. Community Ambulance further objects to
18 Request No. 3 as unduly burdensome to the extent it calls for documents in the
19 possession, custody, and control of Maricopa Ambulance.

20 Subject to and without waiving this objection, Community Ambulance
21 anticipates relying upon documents in the public record, including Intervenors
22 ARCRs (including Maricopa Ambulance) (Exhibits CA44-45, 47,49-50, 52-53, 55-
23 56, 58-59, 61-62, 64, 67-68, 70-71, and currently available 2017 ARCRs for ABC
24 Ambulance and Maricopa Ambulance yet to be disclosed as hearing exhibits) and
25 Maricopa County census data (Exhibit CA-150), as well as well as documents
26 produced by Intervenors and Dignity Health in response to the currently pending
27 subpoenas. Community Ambulance reserves its right to supplement its response
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1 and disclose documents responsive to Request No. 3 on a rolling basis up to and
2 including the deadline for final exhibit disclosures.

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4 **Request No. 4**

5 All documents used, considered, or relied upon by Applicant to assess the
6 potential financial impact on existing CON Holders, including but not limited to
7 Maricopa Ambulance, if Applicant receives a CON.

8 **Response to Request No. 4**

9 Community Ambulance objects to Request No. 4 as overly broad and
10 premature to the extent it calls for the production of documents that are currently
11 subject to subpoenas issued to Intervenors (including Maricopa Ambulance) and
12 Dignity Health necessary to assess the potential financial impact on the CON
13 Holders in Maricopa County. Community Ambulance cannot produce documents
14 responsive to Request No. 4 until it has received responses to its subpoenas.
15 Community Ambulance further objects to Request No. 4 as unduly burdensome
16 to the extent it calls for documents in the possession, custody, and control of
17 Maricopa Ambulance.

18 Subject to and without waiving this objection, Community Ambulance
19 anticipates relying upon documents in the public record, including ARCRs for
20 Intervenors, as well as well as documents produced by Intervenors in response to
21 the currently pending subpoenas. Community Ambulance reserves its right to
22 supplement its response and disclose documents responsive to Request No. 4 on
23 a rolling basis up to and including the deadline for final exhibit disclosures.

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25 **Request No. 5**

26 All documents used, considered, or relied on by Jeffrey O'Malley to support
27 his proposed testimony regarding (1) Dignity Health's approximate needs for non-
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1 emergency interfacility transports within Applicant's proposed service area, (2)
2 Dignity Health's efforts to develop relationships with CON holders in Maricopa
3 County to provide interfacility transports for the Dignity Health population,
4 specifically including but not limited to Maricopa Ambulance (3) his claim
5 regarding substandard interfacility transport performance Dignity Health
6 facilities have experienced by other CON holders in the proposed service area,
7 and (4) meetings with representatives of Dignity Health hospitals, urgent care
8 centers, and other associated facilities to discuss optimization of Dignity Health
9 patient transports.

10 **Response to Request No. 5**

11 Community Ambulance objects to request No. 5 as overly broad and
12 premature as the documents sought through Request No. 5 are in the possession,
13 custody and control of Dignity Health and other Intervenors and are currently
14 subject to subpoenas issued to Dignity Health and Intervenors. Community
15 Ambulance cannot produce documents responsive to Request No. 5 until it has
16 received responses to its subpoenas. Community Ambulance further objects to
17 Request No. 5 as unduly burdensome to the extent it calls, in part, for documents
18 publicly available to Maricopa Ambulance, including hearing exhibits previously
19 disclosed by Community Ambulance, including the Application (CA-1, CA-2) and
20 Community Ambulance's March 27, 2017 revised ARCR
21 ([https://www.azdhs.gov/documents/preparedness/emergency-medical-services-
22 trauma-system/ambulance/ground/received-applications/initial/community-
23 ambulance/applicants-revised-arcr.pdf](https://www.azdhs.gov/documents/preparedness/emergency-medical-services-trauma-system/ambulance/ground/received-applications/initial/community-ambulance/applicants-revised-arcr.pdf)), and the letters of support provided by
24 Arizona General Hospital and various fire chiefs, previously disclosed as hearing
25 exhibits (CA-111-118).

26 Subject to and without waiving this objection, Community Ambulance
27 anticipates relying upon documents in the public record, including ARCRs for
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1 Intervenor, as well as well as documents produced by Intervenor in response to
2 the currently pending subpoenas. Community Ambulance reserves its right to
3 supplement its response and disclose documents responsive to Request No. 5 on
4 a rolling basis up to and including the deadline for final exhibit disclosures.

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6 **Request No. 6**

7 All documents used, considered, or relied on by Rob Richardson to support
8 his proposed testimony regarding the reasons Community Ambulance is fit and
9 proper to provide the proposed interfacility services contemplated by its
10 application, Community Ambulance's fiscal competence, resources, financial
11 viability, and ability to expand its resources to address population growth in the
12 Dignity Health system in Maricopa County, as well as Community Ambulance's
13 plan to ensure interfacility transport service will be maintained and improved for
14 remote or rural Maricopa County communities.

15 **Response to Request No. 6**

16 Community Ambulance objects to Request No. 6 as overly broad and
17 unduly burdensome. Community Ambulance further objects to this request as
18 premature with respect to some of the documents related to Community
19 Ambulance being fit and proper which are in the possession, custody and control
20 of Community Ambulance's majority member, Dignity Health. Community
21 Ambulance further objects to Request No. 6 as unduly burdensome to the extent
22 it calls, in part, for documents publicly available to Maricopa Ambulance,
23 including hearing exhibits previously disclosed by Community Ambulance,
24 including the Application (CA-1, CA-2) and Community Ambulance's March 27,
25 2017 revised ARCR ([https://www.azdhs.gov/documents/preparedness/emergency-
26 medical-services-trauma-system/ambulance/ground/received-
27 applications/initial/community-ambulance/applicants-revised-arcr.pdf](https://www.azdhs.gov/documents/preparedness/emergency-medical-services-trauma-system/ambulance/ground/received-applications/initial/community-ambulance/applicants-revised-arcr.pdf));

1 [https://www.azdhs.gov/documents/preparedness/emergency-medical-services-](https://www.azdhs.gov/documents/preparedness/emergency-medical-services-trauma-system/ambulance/ground/received-applications/initial/community-ambulance/substantive-review-response.pdf)
2 [trauma-system/ambulance/ground/received-applications/initial/community-](https://www.azdhs.gov/documents/preparedness/emergency-medical-services-trauma-system/ambulance/ground/received-applications/initial/community-ambulance/substantive-review-response.pdf)
3 [ambulance/substantive-review-response.pdf](https://www.azdhs.gov/documents/preparedness/emergency-medical-services-trauma-system/ambulance/ground/received-applications/initial/community-ambulance/substantive-review-response.pdf) (rural area plan) and the letters of
4 support provided by Arizona General Hospital and various fire chiefs, previously
5 disclosed as hearing exhibits (CA-111-118).

6 Subject to and without waiving these objections, Community Ambulance
7 discloses documents responsive to this request, and reserves its right to
8 supplement its response and disclose documents responsive to Request No. 6 on
9 a rolling basis up to and including the deadline for final exhibit disclosures.

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11 **Request No. 7**

12 All documents used, considered, or relied on by Linda Hunt to support her
13 proposed testimony regarding (1) Dignity Health's experiences with interfacility
14 ambulance transportation, and the providers of ambulance services in the
15 proposed service area (Maricopa County) and surrounding areas, (2) throughput
16 issues in the Dignity Health systems, and the effects interfacility transport
17 delays can have on efficient hospital operations, as well as patient care, outcomes,
18 and satisfaction, (3) Dignity Health's desire and need for an integrated
19 interfacility ambulance service to better serve Dignity Health's patient
20 population.

21 **Response to Request No. 7**

22 Community Ambulance objects to request No. 7 as premature as the
23 documents sought through Request No. 7 are in the possession, custody and
24 control of Dignity Health and other Intervenors. Community Ambulance cannot
25 produce documents responsive to Request No. 7 until it has received responses to
26 its subpoenas.

27 Subject to and without waiving these objections, Community Ambulance
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1 anticipates disclosing documents responsive to Request No. 7 as that information
2 becomes available to Community Ambulance through responses to subpoenas
3 and reserves its right to supplement its response and disclose documents
4 responsive to Request No. 7 on a rolling basis up to and including the deadline
5 for final exhibit disclosures.

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7 **Request No. 8**

8 All documents used, considered, or relied on by W. Michael Evans to
9 support his proposed testimony regarding the potential financial impact on other
10 CON holders in the proposed service area, specifically including but not limited
11 to Maricopa Ambulance.

12 **Response to Request No. 8**

13 Community Ambulance objects to Request No. 8 concerning W. Michael
14 Evans potential testimony “concerning the potential financial impact on other
15 CON holders in the proposed service area” as premature. Community Ambulance
16 has requested through subpoenas issued to Intervenors documents necessary for
17 Mr. Evans to assess the potential financial impact on the CON Holders in
18 Maricopa County. Community Ambulance cannot produce documents responsive
19 to Request No. 8 until it has received responses to its subpoenas. Community
20 Ambulance reserves the right to supplement its response and disclose documents
21 responsive to Request No. 8 on a rolling basis up to and including the deadline
22 for final exhibit disclosures.

23 Subject to and without waiving these objections, Community Ambulance
24 discloses documents it believes are responsive to Request No. 8 and anticipates
25 disclosing documents responsive to Request No. 8 as that information becomes
26 available to Community Ambulance through responses to subpoenas and
27 reserves its right to supplement its response and disclose documents responsive
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1 to Request No. 8 on a rolling basis up to and including the deadline for final
2 exhibit disclosures.

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4 **Request No. 9**

5 All documents used, considered, or relied on by Brandon Hestand to
6 support his proposed testimony regarding (1) his developing and maintaining
7 relationships with private ambulance providers, including representatives of
8 Intervenors, specifically including but not limited to Maricopa Ambulance, (2)
9 throughput issues and negative patient experiences at CRMC and MGMC caused
10 by interfacility ambulance transport delays, and (3) inconsistencies in
11 compatibility of equipment between Dignity Health facilities and current private
12 ambulance providers, specifically including but not limited to Maricopa
13 Ambulance.

14 **Response to Request No. 9**

15 Community Ambulance objects to request No. 9 as premature as the
16 documents sought through Request No. 9 are in the possession, custody and
17 control of Dignity Health and other Intervenors, namely AMR. Community
18 Ambulance cannot produce documents responsive to Request No. 9 until it has
19 received responses to its subpoenas.

20 Subject to and without waiving these objections, Community Ambulance
21 anticipates disclosing documents responsive to Request No. 9 as that information
22 becomes available to Community Ambulance through responses to subpoenas
23 and reserves its right to supplement its response and disclose documents
24 responsive to Request No. 9 on a rolling basis up to and including the deadline
25 for final exhibit disclosures.

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Request No. 10

All documents used, considered, or relied on by Delores Kells to support her proposed testimony regarding delays the Urgent Care Centers experience in scheduling transports and in arrivals times of ambulances, the necessity of an additional provider of interfacility transports to efficiently move patients from the Urgent Care Centers to facilities with higher levels of care, throughput issues at the Urgent Care Centers, and instances of Dignity Health patients leaving Urgent Care Centers against medical advice to drive themselves to facilities with higher levels of care due to delayed interfacility transports.

Response to Request No. 10

Community Ambulance objects to request No. 10 on the grounds that the documents sought through Request No. 10 are in the possession, custody and control of Dignity Health and other Intervenors, namely AMR. Community Ambulance cannot produce documents responsive to Request No. 10 until it has received responses to its subpoenas.

Subject to and without waiving these objections, Community Ambulance anticipates disclosing documents responsive to Request No. 10 as that information becomes available to Community Ambulance through responses to subpoenas and reserves its right to supplement its response and disclose documents responsive to Request No. 10 on a rolling basis up to and including the deadline for final exhibit disclosures.

Request No. 11

All documents used, considered, or relied on by Dr. Paul McHale to support his proposed testimony regarding throughput bottlenecking issues that cause patient holds on a regular basis in the CRMC and MGMC Emergency Departments.

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Response to Request No. 11

Community Ambulance objects to this request to the extent it calls for the production of documents in the possession, custody, and control of Paul McHale, M.D., Dignity Health, and possibly Intervenors such as AMR. Community Ambulance objects to Request No. 11 as premature to the extent potentially relevant and responsive documents may be produced by Dignity Health and/or AMR in response to the subpoenas.

Subject to and without waiving these objections, Community Ambulance anticipates disclosing documents responsive to Request No. 11 as that information becomes available to Community Ambulance through responses to subpoenas, and reserves its right to supplement its response and disclose documents responsive to Request No. 11 on a rolling basis up to and including the deadline for final exhibit disclosures.

Request No. 12

All documents used, considered, or relied on by Mark Burdick to support his proposed testimony regarding throughput bottlenecking issues at hospital facilities and the need for an additional interfacility transport provider to supplement the existing EMS system.

Response to Request No. 12

Community Ambulance objects to Request No. 12 as premature to the extent it calls for the production of documents in the possession, custody, and control of Mark Burdick, Dignity Health, and/or Intervenors.

Subject to and without waiving these objections, Community Ambulance anticipates disclosing documents responsive to Request No. 12 as that information becomes available to Community Ambulance through responses to subpoenas and reserves its right to supplement its response and disclose

1 documents responsive to Request No. 12 on a rolling basis up to and including
2 the deadline for final exhibit disclosures.

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4 **Request No. 13**

5 All documents used, considered, or relied on by Dr. David Argue to support
6 his proposed testimony and expert opinions concerning (1) the benefits of
7 competition in the provision of ambulance services to the patient population of
8 Maricopa County, and more specifically in terms of improvements in the quality
9 of care for that population, (2) that where customers have a choice of ambulance
10 providers, private providers tend to provide higher quality of care and service, (3)
11 the benefits granting a CON to Community Ambulance could provide to Maricopa
12 County and its residents including increased quality of service and a reduction in
13 risk in having just a few available private ambulance providers.

14
15 **Response to Request No. 13**

16 Community Ambulance objects to Request No. 13 as premature.
17 Community Ambulance has requested documents through subpoenas issued to
18 Intervenors and Dignity Health necessary for Mr. Argue to formulate and express
19 his anticipated opinions and proposed testimony. Community Ambulance cannot
20 produce documents responsive to Request No. 13 until it has received responses
21 to its subpoenas.

22 Subject to and without waiving these objections, Community Ambulance
23 anticipates disclosing documents responsive to Request No. 13 as that
24 information becomes available to Community Ambulance, and is currently in the
25 process of collecting documents responsive to Request No. 13 and intends to
26 produce such documents as they are collected. Further, Community Ambulance
27 reserves its right to supplement its response and disclose documents responsive
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1 to Request No. 13 on a rolling basis up to and including the deadline for final
2 exhibit disclosures.

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4 **Request No. 14**

5 All documents for the period January 1, 2015, to the present, reflecting all
6 interfacility transports requested by Dignity Health from all of their facilities in
7 Maricopa County (including the facility requesting the transport; the ambulance
8 company the request was made to; the time the transport was requested by
9 Dignity Health; the time that the transport was scheduled to occur; the
10 negotiated pick up time, if any; the time the ambulance actually arrived; the time
11 the ambulance departed the facility with the patient; and the destination of the
12 patient transport.)

13 **Response to Request No. 14**

14 Community Ambulance objects to Request No. 14 as it calls for the
15 production of documents in the possession, custody or control of Dignity Health
16 and/or Intervenor AMR. Community Ambulance further objects on the grounds
17 that documents, information, and data for the interfacility transports have been
18 requested through Community Ambulance's subpoenas directed to Intervenor
19 AMR and Dignity Health. Community Ambulance cannot produce documents
20 responsive to Request No. 14 until it has received responses to its subpoena.

21 Subject to and without waiving these objections, Community Ambulance
22 does not have documents in its possession, custody or control responsive to this
23 request at this time, however, reserves it right to supplement this response when
24 it receives documents in response to its subpoenas.

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Request No. 15

All documents reflecting the hours of operation of each of Applicant’s proposed staffed ambulances and the sub-operation or posting location of each of these ambulances.

Response to Request No. 15

Community Ambulance objects to Request No. 15 as unduly burdensome to the extent it calls for the production of information that is publicly and equally available to Maricopa Ambulance through Community Ambulance’s Initial Application at page 2 of 4 (“Hours of Operation X 24 hours/ 7 days a week) <https://www.azdhs.gov/documents/preparedness/emergency-medical-services-trauma-system/ambulance/ground/received-applications/initial/community-ambulance/06-10-16-initial-application-part-1.pdf>, and the September 28, 2016 Substantive Review Response, which details the sub-operation locations for Community Ambulance <https://www.azdhs.gov/documents/preparedness/emergency-medical-services-trauma-system/ambulance/ground/received-applications/initial/community-ambulance/substantive-review-response.pdf>

Subject to and without waiving these objections, Community Ambulance does not currently have any other documents responsive, however, reserves its right to up to and including the deadline for final exhibit disclosures.

Request No. 16

All documents for the period January 1, 2015, to the present, reflecting interfacility transports that Dignity Health requested, the payment for which was guaranteed by Dignity Health, as opposed to those the patient was required to pay, including the dollar amount Dignity Health paid for those transports.

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Response to Request No. 16

Community Ambulance objects to Request No. 16 to the extent it calls for the production of documents in the possession, custody, and control of Dignity Health and/or Intervenor AMR. Community Ambulance further objects to Request No. 16 as overly broad and vague and ambiguous with respect to the geographic location of the interfacility transports about which Request No. 16 seeks information, and calls for the production of documents that are not relevant to the extent that Community Ambulance does yet provided ambulance transports in the State of Arizona.

Subject to and without waiving these objections, Community Ambulance does not have documents in its possession, custody or control responsive to this request at this time, but reserves it right to supplement this response if and when it receives documents to its subpoenas.

Request No. 17

All workpapers and other documents used or relied upon by Applicant in preparation of its original pro forma ARCR and any amendments thereto, including, without limitation, all documents pertaining to the computations and/or methodologies used by Applicant in deriving each of the figures set forth in original pro forma ARCR and any amendments thereto.

Response to Request No. 17

Community Ambulance objects to Request No. 17 as overly broad, unduly burdensome, vague and ambiguous with respect to the phrase “workpapers”.

Subject to and without waiving these objections, Community Ambulance is currently in the process of collecting additional documents responsive to Request No. 17 and intends to produce such documents as they are collected. Community Ambulance further reserves the right to produce responsive

1 documents on a rolling basis up to and including the deadline for final exhibit
2 disclosures.

3
4 **Request No. 18**

5 A copy (or a list) of all written complaints or lawsuits lodged or filed against
6 Applicant or Dignity Health in Nevada or Arizona from January 1, 2015, to the
7 present.

8 **Response to Request No. 18**

9 Community Ambulance objects to Request No. 18 as overly broad and
10 unduly burdensome to the extent it seeks the production of documents that are
11 publicly available and equally accessible to Intervenor Maricopa Ambulance.
12 Community Ambulance further objects on the grounds that the terms “written
13 complaints” and “lodged or filed” are vague and ambiguous, and not reasonably
14 specific in so far as this request could include written documents or complaints
15 “lodged or filed” with a court, government agency, website, or bureau, but
16 Community Ambulance has never been provided notice of such complaint.
17 Community Ambulance further objects to Request No. 18 on the grounds that it
18 calls, in part, for the production of documents in the custody and/or control of
19 Dignity Health. Community Ambulance objects on the grounds that Request No.
20 18 calls for the production of documents that are not relevant and not likely to
21 lead to the discovery of admissible evidence. Community Ambulance further
22 objects to the extent Request No. 18 may call for the production of documents
23 subject to the attorney-client privilege and protected from disclosure by the work-
24 product doctrine.

25 Subject to and without waiving these objections, Community Ambulance
26 produces non-privileged documents in its possession it believes to be responsive
27 to this request.

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RESPECTFULLY SUBMITTED this 25th day of July, 2018

HENDRICKS MURPHY, PLLC

By /s/ Brendan Murphy
Brendan Murphy
3101 N. Central Ave., Suite 970
Phoenix, Arizona 85012

THE MEYERSON LAW FIRM, PLC

Jeffrey Meyerson
2555 East Camelback Road
Suite 140
Phoenix, Arizona 85016

Attorneys for Applicant

ORIGINAL filed this 25th day of July, 2018 via the OAH electronic document filing system <https://portal.azoah.com/oedf>, 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/2017-EMS-0104-DHS/index.html>, in accordance with Case Management Order No. 1.

COPY of the foregoing with responsive documents mailed and emailed with responsive documents made available via shared link in dropbox.com this 25th day of July, 2018 to:

James Belanger
J. Belanger Law PLLC
340 E. Palm Lane, Suite 255
Phoenix, 85004
ijb@jbelangerlaw.com
Attorney for Intervenor Maricopa Ambulance, LLC

By: /s/ Brendan Murphy