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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 **NOTICE REGARDING INTENT TO**)
22 **ADHERE TO PROCEDURAL**)
23 **FORMALITIES REGARDING THE**)
24 **BUREAU’S LEGAL**)
25 **MEMORANDUM AND**)
26 **APPLICANT’S “RESPONSE”**)

(Assigned: The Hon. Tammy Eigenheer)

Intervenors, American Medical Response of Maricopa, LLC dba . . . (CON 136);
R/M Arizona Holding, Inc. dba Canyon State Ambulance dba . . . (CON 58); Life Line
Ambulance Service, Inc. (CON 62); Rural/Metro Corp.-Maricopa dba . . . (CON 109);
and Professional Medical Transport, Inc. dba PMT Ambulance dba . . . (CON 71), now
being in receipt of the Bureau’s September 20, 2018 Legal Memorandum and the

1 Applicant's "Response," are compelled to serve notice that given the procedural
2 formalities herein, and their intended compliance with the same, they will not be
3 submitting any "Responses" or "Replies." Case Management Order No. 5 established
4 a September 20, 2018 deadline for prehearing motions and legal memoranda, allowed
5 responses to motions within five business days, and disallowed replies. Undersigned
6 counsel for these Intervenor's did not perceive that any response would be allowed to
7 the Bureau's notice of its position on certain issues, which was not a motion, especially
8 given the fact that ADHS/BEMSTS's interpretation of its own rules and regulations
9 governs. They also do not perceive that it would be procedurally appropriate for them
10 to submit any sort of a "response" or "reply" to the Applicant's
11 "Response." However, their lack of filing any responsive item to the Applicant's
12 "Response" should not be interpreted as their agreement with the same. Rather, it is
13 their attempt to comply with the procedural formalities herein.
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17 DATED this 4th day of October, 2018.

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19 **FLETCHER STRUSE FICKBOHM &
20 WAGNER, PLC**

21 /S/RONNA L. FICKBOHM

22 Ronna L. Fickbohm
23 *Attorneys for Intervenor's-*
24 *AMR CON Holders*
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1 Pursuant to Case Management
2 Order No. 1, electronic filing and
3 service of the foregoing through
4 <https://portal.azoah.com/oedf/>,
5 has been done this 4th day of October, 2018.

6 By: /S/ Linda Clark

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