

LAW OFFICES
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October 5, 2010

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
PO Box 3265
Harrisburg, PA 17105-3265

Re: *Application of United Medical Transport, Ltd.*
PUC No. A-2010-2189481

Dear Secretary Chiavetta:

Enclosed is an original and four (4) copies of the Applicant's *Petition for Extension of Time* to respond to written discovery requests from the protestants, and Certificate of Service.

Please return a time-stamped copy in the enclosed self-addressed envelope.

Very truly yours,
DAVID M. HOLLAR, PLLC



David M. Hollar

DMH/cen

Enc

cc: James D. Campbell, Jr.
Craig A. Doll, Esq.
Michael S. Henry, Esq.
Christina M. Mellott, Esq.
Barnett Satinsky, Esq.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILTY COMMISSION**

IN RE: APPLICATION OF : A-2010-2189481
UNITED MEDICAL TRANSPORT, LTD. :

PETITION FOR EXTENSION OF TIME

COMES NOW, the Applicant, United Medical Transport, Ltd., by and through its undersigned counsel, and pursuant to the provisions of 52 Pa. Code §1.15, respectfully requests that your Honor grant this request for extension of time. In support of this request, United Medical Transport, Ltd. states as follows:

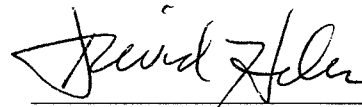
1. The Petitioner is:
United Medical Transport, Ltd.
12301 McNulty Road, Suite M
Philadelphia, PA 19154
2. The name and address of counsel for the Petitioner is:
David M. Hollar
David M. Hollar, PLLC
8 Tower Bridge, Suite 400
161 Washington Street
Conshohocken, PA 19428
610/729-2900
3. The Petitioner/Applicant, United Medical Transport, Ltd., filed its Application to Begin Service on or about April 30, 2010.
4. Between August 23 – 30, 2010, five (5) separate protests to United Medical Transport's Application were filed.
5. On or about September 14, 2010, Protestants Suburban Transit Network, Inc. t/a Transnet, Willow Grove Yellow Cab Co., Inc. t/d/b/a Bux-Mont Transportation Services Co., Norristown Transportation Co. and Tri-County Transit Service, Inc. served their First Set of Interrogatories upon the Applicant.
6. On or about September 15, 2010, Protestant Global Medical Transportation Services, Inc. served its Interrogatories and Requests for Production upon the Applicant.

7. On or about October 1, 2010, Protestants Suburban Emergency Medical Services and Centronia Ambulance Corps, Inc. t/d/b/a Centronia Ambulance Corps served their First Set of Interrogatories and Requests for Production upon the Applicant.
8. Pursuant to 52 Pa. Code §5.342, the Applicant's answers and/or objections would be due October 4, 5 and 21, respectively.
9. Due to the number and volume of written discovery requests, the Applicant requires additional time in which to respond.
10. The Applicant requests and extension of time to and including November 1, 2010 to respond to the written discovery requests of the Protestants.
11. The undersigned has contacted counsel for the various Protestants and they have indicated no objection to the requested continuance.

WHEREFORE, Applicant, United Medical Transport, Ltd.. respectfully requests a extension of time to and including November 1, 2010 respond to the First Set of Interrogatories of Suburban Transit Network, Inc. t/a Transnet, Willow Grove Yellow Cab Co., Inc. t/d/b/a Bux-Mont Transportation Services Co., Norristown Transportation Co. and Tri-County Transit Service, Inc.; Interrogatories and Requests for Production of Global Medical Transportation Services, Inc.; and the First Set of Interrogatories and Requests for Production of Suburban Emergency Medical Services and Centronia Ambulance Corps, Inc. t/d/b/a Centronia Ambulance.

Date: 10/4/10

DAVID M. HOLLAR, PLLC



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161 Washington Street
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610-729-2900
Attorney for Applicant

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

IN RE: APPLICATION OF : A-2010-2189481
UNITED MEDICAL TRANSPORT, LTD. :

CERTIFICATE OF SERVICE

I, David M. Hollar, hereby certify that the *Petition for Extension of Time* was filed electronically on the Commission's electronic filing system and that I served a true and correct copy of the *Petition for Extension of Time* on all parties directly or through their counsel of record on October 5, 2010 by mailing same by first-class, postage pre-paid addressed as follows:

James D. Campbell, Jr.
Caldwell & Kearns
3631 N. Front Street
Harrisburg, PA 17110-1533
*Attorney for Bucks County Transport,
Inc.*

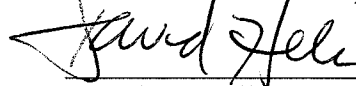
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Hummelstown, PA 17036-0403
*Attorney for Global Medical
Transportation Services*

Michael S. Henry, Esq.
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*Attorney for MCT Transport (Concord
Paratransit)*

Christina M. Mellott, Esq.
Page Wolfberg & Wirth
5010 E. Trindle Road, Suite 202
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*Attorney for Suburban Emergency
Medical Services and Cetronia
Ambulance Corp.*

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Fox Rothschild, LLP
2000 Market Street, 20th Floor
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*Attorney for Suburban Transit Network
(TransNet), Willow Grove Yellow Cab
Co (Bux-Mont Transportation Services),
Norristown Transportation Company
and Tri-County Transit Service, Inc.*

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