



P : 570-820-3332
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Phone Extension 305
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August 28, 2012

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Via Federal Express

ROSEMARY CHIAVETTA, SECRETARY
PENNSYLVANIA PUBLIC UTILITY COMMISSION
400 NORTH STREET, 2ND FLOOR
HARRISBURG, PA 17120

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

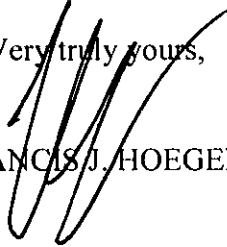
RE: Pennsylvania Public Utility Commission Bureau of Investigation and
Enforcement v. Shenanigans Transport Services, Inc. / Docket #C-2012-2318431

Dear Ms. Chiavetta:

Enclosed please find the original Answers to Complaint.

If you have any questions or comments, please do not hesitate to contact me.

Very truly yours,


FRANCIS J. HOEGEN

FJH/h
Encl.

Cc: Wayne T. Scott, Prosecutor (w/encl.)
David W. Loucks, Chief (w/encl.)
Client (w/encl.)

LA:Century MedicalPUC 1st1.Doc

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AUG 28 2012

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION :
BUREAU OF INVESTIGATION AND ENFORCEMENT :

vs. :

DOCKET NO. C-2012-2318431

SHENANIGANS TRANSPORT SERVICES, INC. :
6 ROSE LANE :
WILKES-BARRE, PA 18702 :

ANSWERS TO COMPLAINT

AND NOW COMES, Shenanigans Transport Services, Inc., by merger Century Medical Response, Inc., through its counsel, Hoegen & Associates, and answers the Complaint of the Pennsylvania Public Utility Commission ("Commission") and in support thereof avers as follows:

1. Admitted in part and denied in part. It is admitted that a Certificate of Authority was issued to Shenanigans Transport Services, Inc. ("Shenanigans"). By way of further answer, on June 20, 2012 Shenanigans Transport Services, Inc. merged with Century Medical Response, Inc. ("Century"). A copy of the Articles/Certificate of Merger and Plan of Merger are attached hereto.

By way of further answer, attached is a copy of the insurance certificate confirming that Century was insured at all times.

By way of further answer, beginning on June 20, 2012 any and all transportation services performed by Shenanigans was done so with coverage of Century's insurance. Pursuant to the rules governing the Commission, application will be made to register the merger with the Commission upon receipt of the fully filed and accepted Certificate of Merger attached hereto.

2. Admitted.

3. Admitted.

4. Denied. It is specifically denied that liability insurance was not maintained. To the contrary, pursuant to the Certificate of Merger and the attached Certificate of Insurance from Century, Shenanigans has maintained insurance.

5. Denied. Paragraph 5 contains a conclusion of law which does not require a response. To the extent a response is required, set averment is specifically denied.

WHEREFORE, for the foregoing reasons, because a merger has been accomplished and because insurance has remained in place, Shenanigans respectfully requests that the Court dismiss Commission's Complaint.

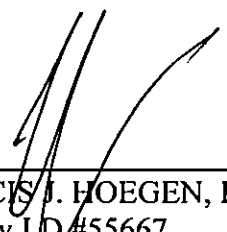
Respectfully submitted,

BY: _____
FRANCIS J. HOEGEN, ESQUIRE
152 South Franklin Street
P.O. Box 346
Wilkes-Barre, PA 18703-0346
(570) 820-3332

VERIFICATION

I, Francis J. Hoegen, Esquire, verify that the statements made in the foregoing Answers to Complaint are true and correct to the best of my knowledge, information and belief and I am authorized to execute this Verification on behalf of the Petitioner. I understand that the statements therein are made subject to the penalties of *18 PA. C.S.A. §4904* relating to unsworn falsification to authorities.

DATE: 8-28-2012



FRANCIS J. HOEGEN, ESQUIRE
Attorney I.D.#55667
HOEGEN & ASSOCIATES, P.C.
152 South Franklin Street
P.O. Box 346
Wilkes-Barre, PA 18703-0346
(570) 820-3332

**PENNSYLVANIA DEPARTMENT OF STATE
CORPORATION BUREAU**

Articles/Certificate of Merger

(15 Pa.C.S.)

- Domestic Business Corporation (§ 1926)
 Domestic Nonprofit Corporation (§ 5926)
 Limited Partnership (§ 8547)

Name		
Francis J. Hoegen, Esq.		
Address		
152 S. Franklin St.		
City	State	Zip Code
Wilkes-Barre, PA		18701

Document will be returned to the name and address you enter to the left.



Fee: \$150 plus \$40 additional for each Party in additional to two

In compliance with the requirements of the applicable provisions (relating to articles of merger or consolidation), the undersigned, desiring to effect a merger, hereby state that:

1. The name of the corporation/limited partnership surviving the merger is:
Century Medical Response, Inc.

2. Check and complete one of the following:

The surviving corporation/limited partnership is a domestic business/nonprofit corporation/limited partnership and the (a) address of its current registered office in this Commonwealth or (b) name of its commercial registered office provider and the county of venue is (the Department is hereby authorized to correct the following information to conform to the records of the Department):

(a) Number and Street	City	State	Zip	County
842 E. Northampton St.	Wilkes-Barre	PA	18702	Luzerne

(b) Name of Commercial Registered Office Provider County
c/o Century Medical Response, Inc. Luzerne

The surviving corporation/limited partnership is a qualified foreign business/nonprofit corporation /limited partnership incorporated/formed under the laws of _____ and the (a) address of its current registered office in this Commonwealth or (b) name of its commercial registered office provider and the county of venue is (the Department is hereby authorized to correct the following information to conform to the records of the Department):

(a) Number and Street	City	State	Zip	County
-----------------------	------	-------	-----	--------

(b) Name of Commercial Registered Office Provider County
c/o _____ _____

The surviving corporation/limited partnership is a nonqualified foreign business/nonprofit corporation/limited partnership incorporated/formed under the laws of _____ and the address of its principal office under the laws of such domiciliary jurisdiction is:

Number and Street	City	State	Zip
-------------------	------	-------	-----

IN TESTIMONY WHEREOF, the undersigned corporation/limited partnership has caused these Articles/Certificate of Merger to be signed by a duly authorized officer thereof this

20th day of June,

2012.

Century Medical Response, Inc.

Name of Corporation/Limited Partnership

Mary A. Kim
Signature

President
Title

Shenanigans Transport Services,

Name of Corporation/Limited Partnership INC.

Mary A. Kim
Signature

President
Title

**EXHIBIT A TO
ARTICLES OF MERGER**

PLAN AND AGREEMENT OF MERGER

This PLAN OF MERGER is entered into this 20th day of June, 2012 ("Effective Date"), between Shenanigans Transport Services, Inc., a Pennsylvania corporation (hereinafter called "Company"), and Century Medical Response, Inc., a Pennsylvania corporation (hereinafter called "Buyer" and as the survivor of the Merger provided for herein called "Surviving Corporation"). The parties hereinafter are sometimes collectively called "Constituent Corporations.

WITNESSETH

WHEREAS, Company is a corporation duly organized and existing under the laws of the Commonwealth of Pennsylvania and Buyer is a corporation duly organized and existing under the laws of the Commonwealth of Pennsylvania; and

WHEREAS, The shareholders of Shenanigans Transport Services, Inc. and the Boards of Directors of Constituent Corporations, by resolutions duly adopted, each have approved this Plan of Merger and declare it to be advisable and in the best interest of Constituent Corporations and their shareholders that Company merge with and into Buyer, which latter corporation shall be the Surviving Corporation, in the manner and upon the terms and conditions set forth herein (the "Merger") pursuant to the applicable provisions of the Pennsylvania Business Corporations Law, as amended (the "BCL").

NOW, THEREFORE, for the purpose of effecting such Merger and prescribing the terms and conditions thereof and in consideration of the mutual covenants and agreements contained herein, Constituent Corporations, intending to be legally bound, hereby covenant and agree as follows:

1. Merger.

Upon compliance with the applicable provisions of the BCL, on the Effective Date (as defined herein), Company shall be merged with and into Buyer and thereupon the separate existence of Company shall cease and Buyer shall continue to exist as "Surviving Corporation."

2. Articles of Incorporation and Bylaws of Surviving Corporation.

The Articles of Incorporation and Bylaws of Buyer, as in effect immediately before the Merger, shall be the Articles of Incorporation and Bylaws of Surviving Corporation thereafter until amended as provided by law and in accordance with their respective terms.

3. Conversion of Securities on Merger.

On the Effective Date, by virtue of the Merger:

3.1 All of the outstanding Common Stock, \$.01 par value, of Company ("Company Common Stock"), including treasury stock, shall be canceled and each share of Company Common Stock shall be exchanged for one share of Common Stock, \$.01 par value of Surviving Corporation ("Surviving Corporation Common Stock"). Such shares of Surviving Corporation Common Stock shall be delivered by Surviving Corporation to each respective shareholder of Company on or after the Effective Date only upon surrender of the certificates representing the shares of Company Common Stock owned by such shareholder.

3.2 Each share of Company Common Stock outstanding and not held as treasury stock immediately prior to the Effective Date shall thereafter represent the right to receive one validly issued, fully paid and non-assessable share of Surviving Corporation Common Stock. Immediately upon the Merger's becoming effective, the equity interest of the shareholders of Company as shareholders of Company shall and be extinguished and their right shall be to receive the consideration as set forth above.

3.3 Each share of Surviving Corporation Common Stock shall remain outstanding.

4. Amendment of Plan.

This Plan of Merger may be amended by the mutual agreement of the Boards of Directors of Constituent Corporations at any time prior to its Effective Date, except that an amendment made subsequent to the adoption of this Plan by the shareholders of a Constituent Corporation shall not change:

- (1) The amount or kind of shares to be received in exchange for or on conversion of all or any of the shares of Constituent Corporation;
- (2) Any term of the articles of the Surviving Corporation to be effected by the Merger; or
- (3) Any of the terms and conditions of the Plan if the change would adversely affect the holders of any shares of the Constituent Corporation.

5. Directors and Officers of Surviving Corporation.

The directors of Buyer immediately before the Merger will be the initial directors of Surviving Corporation, and the officers of Buyer immediately before the Merger will be the initial officers of Surviving Corporation, in each case until their successors are duly elected or appointed and qualified. If on the Effective Date a vacancy shall exist in any directorship or office of Surviving Corporation, such vacancy shall thereafter be filled in the manner provided by law and the Bylaws of Surviving Corporation.

6. Effective Date.

The Effective Date of the Merger shall be June 20, 2012.

7. State Filings.

The proper officers of Constituent Corporations shall make and execute whatever certificates and documents are required by the Commonwealth of Pennsylvania to effect the Merger, and to cause the same to be filed, in the manner provided by law, and to do all things [whatsoever, whether within or without the Commonwealth of Pennsylvania,] which may be necessary and proper to effect such Merger.

8. Effect of Merger.

On the Effective Date of the Merger:

8.1 The separate existence of the Company shall cease and Buyer shall continue to exist as Surviving Corporation.

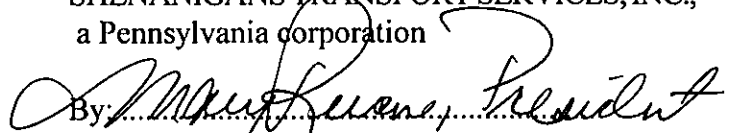
8.2 The Surviving Corporation shall succeed to and possess all of the property (real, personal, permits, certificates and mixed), rights, privileges, immunities, powers, purposes and franchises, and shall be subject to all of the obligations, restrictions and liabilities of Company, all without further act or deed, and all as more fully set forth under the Pennsylvania Business Corporation Law of 1988, as amended.

9. Further Assurances.

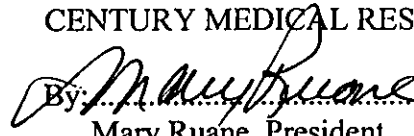
If at any time after the Effective Date, Surviving Corporation shall determine that any further actions or instruments of conveyance are necessary or desirable in order to vest in and confirm to Surviving Corporation full title to and possession of all of the property (real, personal and mixed), rights, privileges, immunities, powers, purposes and franchises of Company, then the officers or directors of Surviving Corporation, or at their request the persons who were officers and directors of Company immediately prior to the Effective Date, as such officers and directors, shall have the authority to and shall take all such actions and execute and deliver all such instruments as Surviving Corporation may so determine to be necessary or desirable.

IN WITNESS WHEREOF, the parties hereto have duly executed this Plan of Merger on the date first above written.

SHENANIGANS TRANSPORT SERVICES, INC.,
a Pennsylvania corporation

By:  President
Mary Ruane, President

CENTURY MEDICAL RESPONSE, INC.

By 

Mary Ruane, President

Docketing Statement (Changes)
DSCB:15-134B

BUREAU USE ONLY:

Revenue Labor & Industry

Other _____

File Code _____ Filed Date _____

Part I. Complete for each filing:

Current name of entity or registrant (<i>survivor or new entity if merger or consolidation</i>): <u>Century Medical Response, Inc.</u>			
Entity number, if known:	<u>3923695</u>	Incorporation/qualification date in PA:	<u>12/18/2009</u>
State of Inc:	<u>PA</u>	Federal EIN:	<u> </u>
Specified effective date, if any:			<u>06/20/2012</u>

Part II. Check proper box:

<input type="checkbox"/> Amendment (complete Section A)	<input checked="" type="checkbox"/> Merger, Consolidation or Division (complete Section B,C or D)
<input type="checkbox"/> Consolidation (complete Section C)	<input type="checkbox"/> Division (complete Section D)
<input type="checkbox"/> Conversion (complete Section A & E)	<input type="checkbox"/> Correction (complete Section A)
<input type="checkbox"/> Termination (complete Section H)	<input type="checkbox"/> Revival (complete Section G)
<input type="checkbox"/> Dissolution before Commencement of Business (complete Section F)	

<input type="checkbox"/> Section A – Check box(es) which pertain to changes:				
<input type="checkbox"/> Name: _____				

<input type="checkbox"/> Registered Office: Number & street/RD number & box number	City	State	Zip	County

<input type="checkbox"/> Purpose: _____				

<input type="checkbox"/> Stock (aggregate number of share authorized): _____	<input type="checkbox"/> Effective date: _____			
<input type="checkbox"/> Term of Existence: _____	<input type="checkbox"/> Other: _____			

<input checked="" type="checkbox"/> Section B – Merger Complete Section A if any changes to surviving entity:		
Merging Entities are: (<i>attach sheet for additional merging entities</i>)		
Name:	Entity #, if known:	
<u>Century Medical Response, Inc.</u>	<u>3923695</u>	
Effective date:	Inc./qual. date in PA.	State of Inc.
<u>06/20/2012</u>	<u>12/18/2009</u>	<u>PA</u>
Name:	Entity #, if known:	
<u>Shenanigans Transport Services, Inc.</u>	<u>3812627</u>	
Effective date:	Inc./qual. date in PA.	State of Inc.
<u>06/20/2012</u>	<u>5/27/2008</u>	<u>PA</u>

One (1) required

BUREAU USE ONLY:	
Dept. of State Entity #	_____
Dept. of Rev. Box #	_____
Filing Period _____	Date 3 4 5 _____
SIC/NAICS _____	Report Code _____

Check proper box:

Pennsylvania Entities

<input type="checkbox"/> business stock
<input type="checkbox"/> business non-stock
<input type="checkbox"/> professional
<input type="checkbox"/> nonprofit stock
<input type="checkbox"/> nonprofit non-stock
<input type="checkbox"/> statutory close
<input type="checkbox"/> management
<input type="checkbox"/> cooperative
<input type="checkbox"/> insurance
<input type="checkbox"/> limited liability company
<input type="checkbox"/> restricted professional
<input type="checkbox"/> limited liability company
<input type="checkbox"/> business trust

Foreign Entities

State/Country _____	Date _____
<input type="checkbox"/> business	
<input type="checkbox"/> nonprofit	
<input type="checkbox"/> limited liability company	
<input type="checkbox"/> restricted professional	
<input type="checkbox"/> limited liability company	
<input type="checkbox"/> business trust	

Other

<input type="checkbox"/> domestication
<input type="checkbox"/> division
<input checked="" type="checkbox"/> consolidation

1. Entity Name: <u>Century Medical Response, Inc.</u>
--

2. Individual name and mailing address responsible for initial tax reports: <u>Mary Ruane</u> <u>842 E. Northampton St., Wilkes-Barre, PA 18702</u>
Name Number and street City State Zip

3. Description of business activity: <u>Transportation</u>

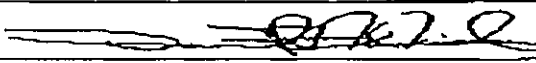
4. Specified effective date, if any: <u>06/20/2012</u> _____ month/day/year hour, if any

5. EIN (Employer Identification Number), if any: _____

6. Fiscal Year End: <u>12/31</u>

7. Fictitious Name (only if foreign corporation is transacting business in PA under a fictitious name): _____
--

FORMS APPLICABLE TO ALL COVERAGE PARTS (SHOW NUMBERS):
See GU 207

Countersigned: 10/03/2011	By: 
(Date)	(Authorized Representative)

McNeil & Company, Inc.

NOTE
 OFFICERS' FACSIMILE SIGNATURES MAY BE INSERTED HERE, ON THE POLICY COVER OR ELSEWHERE AT THE COMPANY'S OPTION.



Signature Page

IN WITNESS WHEREOF, National Interstate Insurance Company has caused this policy to be executed and attested, and, if required by state law, this policy shall not be valid unless countersigned by a duly authorized representative of the Company.

David W. Michelson
President

Arthur J. Gonzales
Secretary

Anthony J. Mercurio
Authorized Representative

(The Attaching Clause need be completed only when this endorsement is issued subsequent to preparation of the policy.)

ENDORSEMENT

This endorsement, effective on 09/28/2011 at 12:01 A.M. standard time, forms a part of

Policy No. APK000004700 of the National Interstate Insurance Company
(NAME OF INSURANCE COMPANY)

issued to Wyoming Valley Professional Ambulance, Inc.

By McNeil & Company, Inc.



Authorized Representative

LONG NAMED INSURED ENDORSEMENT

The Named Insured is amended to read as follows:

Wyoming Valley Professional Ambulance, Inc.
DBA Century Medical Response

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION :
BUREAU OF INVESTIGATION AND ENFORCEMENT :

vs. :

DOCKET NO. C-2012-2318431

SHENANIGANS TRANSPORT SERVICES, INC. :
6 ROSE LANE :
WILKES-BARRE, PA 18702 :

CERTIFICATE OF SERVICE

I, Francis J. Hoegen, Esquire, hereby certify that on the 28TH day of August, 2012, I served a copy of the Answers to Complaint by First Class United States Mail, postage prepaid addressed to:

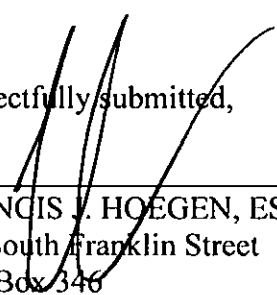
DAVID W. LOUCKS, CHIEF
MOTOR CARRIER ENFORCEMENT
BUREAU of INVESTIGATION and ENFORCEMENT
PO BOX 3265
HARRISBURG, PA 17105-3265

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AUG 28 2012

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Respectfully submitted,

BY: 
FRANCIS J. HOEGEN, ESQUIRE
152 South Franklin Street
P.O. Box 346
Wilkes-Barre, PA 18703-0346
(570) 820-3332

From: (570) 820-3332
FRANCIS J. HOEGEN, ESQ.
HOEGEN & ASSOCIATES
152 S. FRANKLIN STREET

Origin ID: HZLA



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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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SHIP TO: (717) 787-3834

BILL SENDER

Rosemary Chiavetta, Secretary
PA Public Utility Commission
400 NORTH ST

HARRISBURG, PA 17120

Ref # CENTURY MEDICAL
Invoice #
PO #
Dept #

TRK# 7988 3865 6540

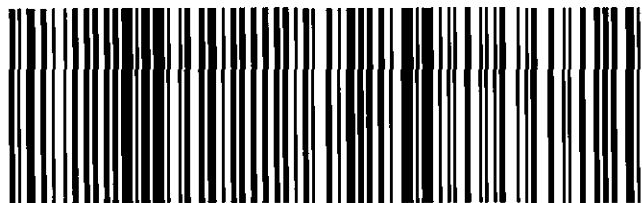
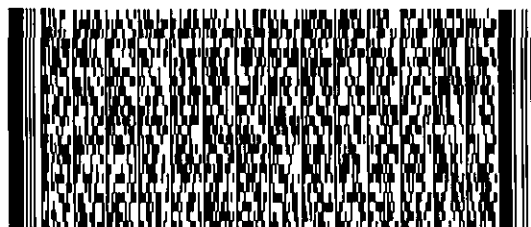
0201

17120

PA-US

MDT

ZN MDTA



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