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September 8, 2015

## **FILED ELECTRONICALLY**

10045.56

**Re: Application of Century Medical Response, Inc.  
A-2015-2465681**

**VIA EMAIL ONLY (ejandebeur@pa.gov)**

The Honorable Ember S. Jandebeur  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
Room 317, Scranton State Office Building  
100 Lackawanna Avenue  
Scranton, PA 18503

Dear Judge Jandebeur:

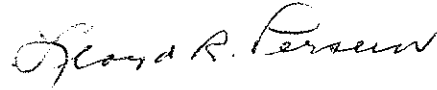
We represent MTR Transportation, Inc. (MTR) t/d/b/a K-Cab Co., a protestant. By Interim Order dated August 14, 2015, your Honor directed Applicant to respond fully to all interrogatories and requests for documents on or before September 3, 2015 and that in default thereof the Application will be dismissed.

On MTR's behalf, I hereby certify that MTR and I did not receive any response by Applicant to MTR's Interrogatories or its Request for Production of Documents. Accordingly, we hereby request that the Application be dismissed, with prejudice.

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A copy of this letter is filed with the Secretary and served on all parties in the manner indicated below.

Respectfully,



Lloyd R. Persun

LRP:pg

cc: Century Medical Response, Inc.  
P.O. Box 773  
Wilkes-Barre, PA 18703  
**Via First Class Mail**

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Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
2<sup>nd</sup> Floor North  
Commonwealth Keystone Building  
Harrisburg, PA 17110  
**Via Efile**