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September 10, 2015

VIA E-MAIL AND FIRST CLASS MAIL

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

**Re: Application of Century Medical Response, Inc.
PUC Docket No. A-2015-2465681**

Dear Judge Jandebour:

This firm represents Trans-Med Ambulance, Inc. ("Trans-Med"), a Protestant in the above-captioned matter. On August 15, 2015, your Honor issued an "Interim Order Directing Applicant to Respond to Interrogatories" propounded by Trans-Med. This Interim Order directed the Applicant to "fully respond to all interrogatories and request for documents on or before September 3, 2015," and stated that "[f]ailure to fully respond in a timely manner shall result in dismissal of the Application."

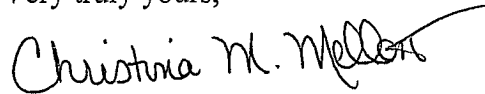
I hereby certify that as of the date of this letter neither this firm nor Trans-Med has received any Answers to Interrogatories. Due to the Labor Day holiday immediately after the September 3rd deadline, we specifically waited until September 10, 2015 to file this letter so that we would have ample time to receive any Answers to Interrogatories that may have been mailed on the date of the deadline. But, as of the date of this letter, Trans-Med and I have each received absolutely nothing from the Applicant regarding Trans-Med's Interrogatories. Accordingly, Trans-Med hereby respectfully requests that the Application of Century Medical Response, Inc.

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be dismissed, with prejudice. A verification and Certificate of Service accompany this letter.

Very truly yours,

A handwritten signature in black ink that reads "Christina M. Mellott". The signature is written in a cursive style with a long, sweeping flourish extending to the right.

Christina M. Mellott

CMM:ms
Enclosures

cc: Century Medical Response, Inc. *(via first class mail)*
Rosemary Chiavetta, Secretary, PA PUC *(via electronic filing)*
Lloyd R. Persun, Esq. *(via email)*
Devin T. Ryan, Esq. *(via email)*
Trans-Med Ambulance, Inc. *(via email)*

VERIFICATION

The undersigned states that she is familiar with the information set forth in the foregoing *Tran-Med Ambulance, Inc. 's letter to the PUC confirming no discovery responses were received by the deadline* and that the facts contained in this letter are true and correct to the best of her knowledge, information and belief. The undersigned understands that false statements herein are made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsification to authorities.

Christina M. Mellott

Signature

Christina M. Mellott

Printed Name

9/10/2015

Date

(717) 691-0100; (717) 691-1226 (fax)

Counsel for Protestant, Trans-Med Ambulance, Inc.