

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

TRI-CONN ALTERNATIVE SERVICES, INC.	:	
	:	
Complainant	:	Complaint Docket
	:	
v.	:	No. C-2016-2528321
	:	
EMS SOUTHWEST, INC.	:	
	:	
Respondent	:	

CONSENT MOTION TO CONTINUE INITIAL HEARING

AND NOW COMES Complainant, Tri-Conn Alternative Services, Inc. (“Tri-Conn”), by and through its counsel, to state and aver the following Consent Motion to Continue Initial Hearing:

1. Pursuant to the Hearing Cancellation/Reschedule Notice dated July 1, 2016, an initial hearing in this matter is scheduled for August 3, 2016.
2. Tri-Conn, with the consent of counsel for Respondent, EMS Southwest, Inc. (“EMS Southwest”), requests a continuance of the initial hearing for approximately forty five (45) days so that the parties may attempt to resolve a discovery dispute and complete discovery in this matter.
3. If the initial hearing is continued, the parties intend to act cooperatively and in good faith to complete discovery prior to the initial hearing.
4. Good cause exists for granting a continuance of the initial hearing.

5. No other continuances have been requested by Tri-Conn, and a continuance of the initial hearing for approximately forty five (45) days will not unreasonably delay a resolution of this matter.

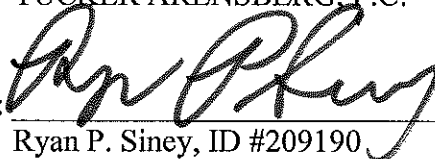
WHEREFORE, Complainant, Tri-Conn Alternative Services, Inc., with the consent of counsel for Respondent, EMS Southwest, Inc., respectfully requests that the initial hearing scheduled for August 3, 2016 be continued for approximately forty five (45) days.

Respectfully submitted,

Date: July 18, 2016

TUCKER ARENSBERG, P.C.

By:



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*Attorneys for Complainant,
Tri-Conn Alternative Services, Inc.*

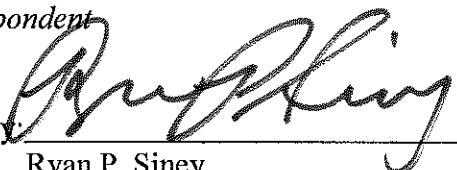
HBGDB:159134-1 027503-154183

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing Consent Motion to Continue Initial Hearing in accordance with the requirements of 52 Pa. Code §1.54 via first class mail, postage prepaid, as follows:

William A. Gray, Esquire
VUONO & GRAY, LLC
310 Grant Street
Suite 2310 Grant Building
Pittsburgh, PA 15219
Attorneys for Respondent

Dated: July 18, 2016

By: 

Ryan P. Siney