

August 5, 2016

**VIA FIRST CLASS MAIL**

**David P. Zambito**

Direct Phone 717-703-5892

Direct Fax 215-989-4216

dzambito@cozen.com

Kenneth Andre Dade  
EA-6297  
SCI Fayette  
Box 9999  
LaBelle, PA 15450

**Re: Kenneth Andre Dade v. Securus Technologies, Inc.; Docket No. C-2016-2547396**

**SECURUS TECHNOLOGIES, INC.'S RESPONSE TO MOTION FOR SUBPOENA OF  
KENNETH ANDRE DADE**

Dear Mr. Dade:

In response to your "Motion to Subpoena Phone Records and for Securus Technologies, Inc. to Turn Over the Approved Tariff," received by my office on July 22, 2016, enclosed please find the following documents:

1. A copy of Securus Technologies, Inc.'s effective tariff, as approved by the Pennsylvania Public Utility Commission, for the period of March 25, 2016 through April 25, 2016 (*i.e.*, the time period involved in your complaint allegations); and,
2. A copy of your telephone records for the period of March 25, 2016 through April 25, 2016.

If you have any questions regarding this response, please direct them to me. Thank you for your attention to this matter.

Sincerely,

COZEN O'CONNOR



By: David P. Zambito  
Counsel for *Securus Technologies, Inc.*

DPZ/kmg  
Enclosures

cc: Honorable Steven K. Haas (*Cover Letter and Verification Only*)  
Rosemary Chiavetta, Secretary (*Cover Letter and Verification Only*)

**VERIFICATION**

I, Linda Nelson, Manager, Regulatory Affairs, Securus Technologies, Inc., hereby state that the facts set forth above are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date:

8/4/16

Linda Nelson