



January 24, 2017

**VIA FIRST CLASS MAIL**

**David P. Zambito**

Direct Phone 717-703-5892

Direct Fax 215-989-4216

dzambito@cozen.com

Shariff Ingram (DV 6749)  
SCI Fayette  
Box 9999  
LaBelle, PA 25450-09999

**Re: Shariff Ingram (DV 6749) v. by Securus Technologies, Inc.; Docket No. C-2016-2573790; SECURUS TECHNOLOGIES INC.'S RESPONSES TO DISCOVERY REQUESTS OF SHARIFF INGRAM (DATED JANUARY 13, 2017 AND RECEIVED JANUARY 23, 2017)**

Dear Mr. Ingram:

In response to your discovery requests (termed an "application for phone records and the tariff")(dated January 13, 2017 and received by the undersigned on January 23, 2017), enclosed please find the following two documents: (1) a copy of your telephone records for the period of March 1, 2016 through January 13, 2017; and, (2) a copy of Securus Technologies, Inc.'s tariff as approved by the Pennsylvania Public Utility Commission. Also enclosed is a verification attesting to the truth and correctness of the enclosed documents.

Thank you for your attention to this matter. I will contact you prior to the hearing date in this matter in order to discuss again the potential for settlement.

Sincerely,

COZEN O'CONNOR

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

DPZ/kmg  
Enclosures

cc: Rosemary Chiavetta, Secretary (*Cover Letter and Certificate of Service only*)

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Securus Technologies, Inc.'s Responses to Shariff Ingram's Discovery Requests (dated January 13, 2017 and received January 23, 2017), upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

### VIA FIRST CLASS MAIL:

Shariff Ingram (DV 6749)  
SCI Fayette  
Box 9999  
LaBelle, PA 25450-09999

DATED: January 24, 2017



David P. Zambito, Esquire  
Counsel for *Securus Technologies, Inc.*