



April 5, 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 v. Securus Technologies, Inc.; Docket No. C-2016-2573790

RESPONSE TO SHARIFF INGRAM MARCH 22, 2017 LETTER RE: ADDITIONAL DISCOVERY

Dear Mr. Ingram:

In response to your letter dated March 22, 2017 in which you request a copy of the contract between Securus Technologies, Inc. ("Securus") and the Pennsylvania Department of Corrections ("DOC"), enclosed please find a copy of the relevant portions of the contract related to taxes. To the extent that you are requesting a complete copy of the contract, Securus objects on the grounds of relevancy and undue burden. 52 Pa. Code §§ 5.361, 5.342(c). The contract is several hundred pages in length and the relevant portions are being produced

Thank you for your attention to this matter. Please contact me with any question or concern.

Sincerely,

COZEN O'CONNOR

By: David P. Zambito
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 response to Shariff Ingram Letter dated March 22, 2017, upon the party, 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: April 5, 2017



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