

# Talbot Law Group

A Professional Corporation

Timothy K. Talbot

1260 Lake Blvd., Suite 209  
Davis, CA 95616  
Voice 530-792-7211  
Fax 530-792-8891  
ttalbot@talbotlawgroup.com

July 13, 2007

**VIA EMAIL [DAVID.BANELLI@EMSC.NET] AND REGULAR MAIL**

David Banelli  
National Vice President Labor Relations  
American Medical Response  
6200 South Syracuse Way #200  
Greenwood Village, CO 80111

**Re: Boston/Northeast Bargaining Unit**

Dear Mr. Banelli:

I am in receipt of your July 11, 2007 letter concerning the status of bargaining in the Boston/Northeast bargaining unit. I must disagree with your assertion that NEMSA leaders and organizers "seek only to create problems and agitate the work force." In actuality, AMR's anti-labor attitude and conduct towards the work force is the cause of any perceived problems. NEMSA leaders continually try to diffuse the animosity bargaining unit members feel towards AMR, while recognizing their legitimate frustrations with the Company.

Your allegations regarding the NEMSA member message board are unfounded. The member message board is an open forum for bargaining unit employees to communicate among themselves about labor relations issues. The views expressed by bargaining unit members on the message board are solely those of the individuals who post messages. Such views do not necessarily reflect the position of NEMSA or its leadership.

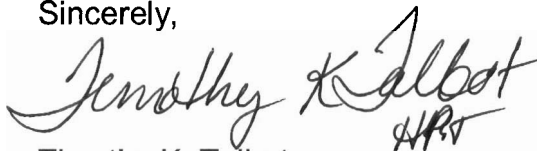
I am dismayed by your assertion that NEMSA must be willing to modify its last position at the bargaining table if the parties are to attain a collective bargaining agreement. As you know, neither party is required to abandon a good faith bargaining position merely because the other party is unwilling to move from its position in the absence of changed circumstances. NEMSA has made multiple good faith economic proposals, supposals and counter proposals in an effort to reach agreement. NEMSA's most recent proposal sought a short term contract with modest economic gains in an effort to accommodate AMR's alleged economic difficulties in the Boston/Northeast

David Banelli  
American Medical Response  
July 13, 2007  
Page 2

bargaining unit. AMR rejected NEMSA's proposals, supposals and counter offers and insisted on a three-year contract with economic reductions. NEMSA rejected AMR's proposal and held to its prior proposal. AMR in turn rejected NEMSA's proposal and held to its prior position. I then advised you that NEMSA was unwilling to compromise further on its economic proposal. You responded that AMR would not move from its position and we both agreed that further discussions would be futile and pointless. I stated that if AMR was unwilling to make another offer, NEMSA would present AMR's last proposal to the membership for a vote. You confirmed that AMR would not change its position and we mutually agreed to adjourn negotiations.

Your letter erroneously suggests that the parties scheduled additional bargaining meetings prior to the conclusion of our last session. As you know, we merely coordinated calendars the following week in Fort Wayne. You stated that because NEMSA members were likely to reject AMR's proposal, the parties should identify some dates for future discussions. At your request, I agreed to hold a couple of dates for a possible return to Boston, provided there is a legitimate reason to do so. NEMSA is not interested in wasting additional time in futile discussions. If AMR is truly interested in compromise and attaining a collective bargaining agreement, the Company must modify its prior position.

Sincerely,

A handwritten signature in cursive script that reads "Timothy K. Talbot". To the right of the signature, there are initials "HRT" written in a similar cursive style.

Timothy K. Talbot

cc: Torren Colcord