

ORIGINAL



BEFORE THE ARIZONA CORPORATE

COMMISSIONERS

BOB STUMP- Chairman
GARY PIERCE
BRENDA BURNS
BOB BURNS
SUSAN BITTER SMITH

2013 MAY -3 P 4: 28

Arizona Corporation Commission

DOCKETED

ARIZONA CORPORATION COMMISSION
DOCKET CONTROL

MAY 3 2013

DOCKETED BY [Signature]

In the matter of:

DOCKET NO. S-20858A-12-0412

INTERNATIONAL AIR MEDICAL SERVICES, INC.,

RESPONDENTS' MOTION TO CONTINUE

THOMAS F. KELLEY and LAURA KELLEY, husband and wife

(EXPEDITED RULING REQUESTED)

Respondents.

Respondents International Air Medical Services, Inc. ("IAMS"), Thomas F. Kelley and Laura Kelley (collectively "Respondents") move to continue the hearing presently scheduled for June 3 - 7, 2013. Respondents request a four month continuance. Respondents have long desired to resolve this case without a hearing. Respondent IAMS is generating significant revenue for air medical transport services it has provided, and anticipates receiving substantial additional revenue over the next few months for other services that have already been billed. This would enable IAMS to repay or restructure its agreements with its investors and/or lenders, and thereby resolve this matter with the Securities Division. IAMS has retained counsel (not the undersigned) with significant transactional and securities experience to help with this process and otherwise restructure its operations and ensure compliance with all relevant securities laws.

If the hearing proceeds as scheduled it would cause Respondents to divert their resources and energy from resolution to an adversarial posture. A hearing and the potential consequences would invariably have adverse implications to IAMS's business operations, and in turn harm the

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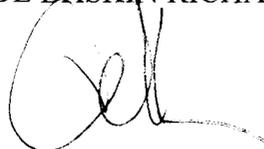
investors and lenders. Respondents believe a continuance is in the best interest of IAMS's investors and lenders.

Finally, undersigned counsel is scheduled to travel to Utah during the latter portion of the week of June 3, 2013.

Undersigned counsel avows that this motion is filed in good faith and not for purposes of delay, and that Respondents wish to have the opportunity to reach an amicable resolution with both investors/lenders and the Securities Division.

RESPECTFULLY SUBMITTED this 30 day of May, 2013.

BADE BASKIN RICHARDS PLC

By 

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1 ORIGINAL and thirteen copies of the foregoing
2 filed this 7 day of May, 2013 with:

3 Docket Control
4 Arizona Corporation Commission
5 1200 West Washington Street
6 Phoenix, AZ 85007

7 COPY of the foregoing hand-delivered
8 this 31 day of ~~October~~^{May}, 2012 to:

9 Hearing Officer
10 Hearing Division
11 1200 W. Washington Street
12 Phoenix, AZ 85007

13 COPY of the foregoing mailed
14 this 31 day of May, 2013 to:

15 Stacy Luedtke
16 Securities Division
17 Arizona Corporation Commission
18 1300 W. Washington, 3rd Floor
19 Phoenix, AZ 85007

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