

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

b. all calendar year reports of disaggregated financial and utilization data

[REDACTED]

[REDACTED]

[REDACTED]

b. the company or HPH and Bain and Company.

5. All documents, from 1988 to the present, all documents relating to the Northwestern Healthcare Network.

6. All annual payment logs or similar documents relating to third-party payer reimbursement to the Company and each of its hospitals, including but not limited to, summaries stating separately for inpatient and outpatient services.

entity, partnership, association, joint venture, government entity, or trust.

F. The term "relating to" means in whole or in part constituting, containing

F. The terms "and" and "or" have both conjunctive and disjunctive meanings.

- (2) Mark each page with corporate identification and consecutive document control numbers. Number each box and mark each box with the name(s) of the person(s) whose files are contained in that box. Documents shall be submitted in sturdy cartons not larger than 1.5 cubic feet, and packed in a manner that reasonably minimizes the cubic footage of the total submission (for example, if a person's files fill only half of a box, please fill the other half with another person's files if possible, rather than leaving

- (3) Responsive documents from each person's files shall be produced together, in file folders or with other enclosures that segregate the person's files by specification number. If a document is responsive to more than one specification, produce the document in response to the specification to which it is primarily responsive

- (4) Provide a master list showing: (a) the name of each person from whom

- (i) File structures. The FTC will accept sequential files only. All other file structures must be converted into sequential format.
- (ii) Record structures. The FTC will accept fixed length records only. All data in the record is to be provided as it would appear in printed format: *i.e.*, numbers unpacked, decimal points and signs printed.

(b) Magnetically-recorded information from microcomputers:
Microcomputer-based data: word-processing documents should be in DOS-text (ASCII), WordPerfect 8 or earlier version, or Microsoft Word 2000 or earlier version format. Spreadsheets should be in Microsoft Excel 2000 (.xls) or earlier version, or Lotus-compatible (.wk1) format. Database files should be in Microsoft Access 2000 (.mdb) or earlier version, or dBase-compatible (.dbf), version 4 or earlier, format. Database or spreadsheet files also may be submitted after conversion to ASCII delimited, comma separated format, with field names as the first record, or to a fixed length fields accompanied by a record length.

(4) Shipping: Magnetic media should be carefully packed to avoid damage, and must be shipped clearly marked: **MAGNETIC MEDIA DO NOT X-RAY.**

(5) Virus Checks: Media will be scanned for viruses. Infected media will be returned for non-release.

VI If any documents are withheld from public release, the following information shall be provided:

IX. In complying with the specifications, the Company may send the responsive materials to the attention of Paul Nolan, Federal Trade Commission, 601 New Jersey Ave., N.W., Washington, DC 20001.

Dated: _____

2/24/04

Thomas H Brock

Thomas H. Brock
Complaint Counsel

Federal Trade Commission

600 Pennsylvania Ave. N.W.

Washington, D.C. 20580
(202) 326-2813

UNITED STATES OF AMERICA

DEPARTMENT OF JUSTICE

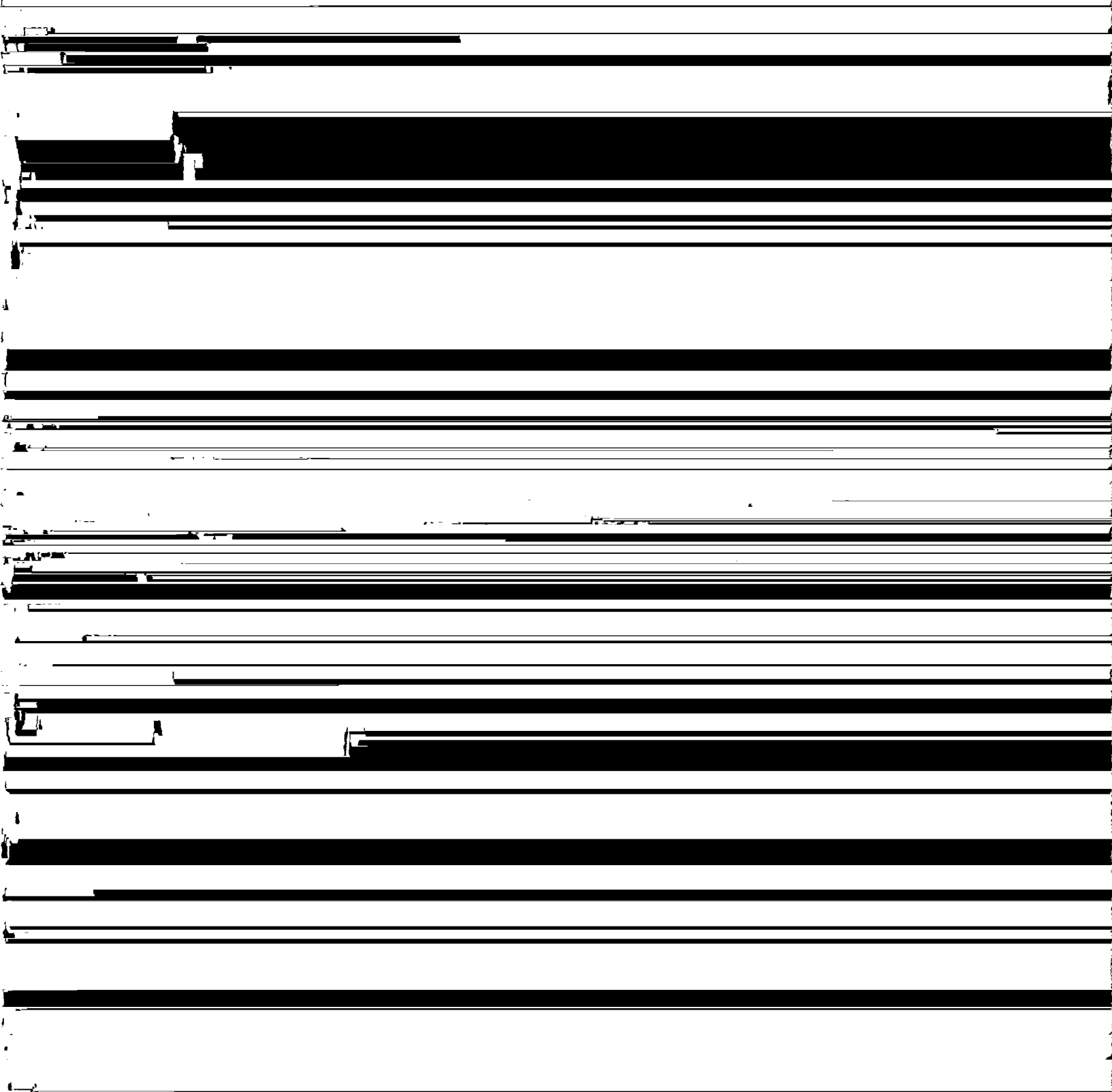
In the matter of)
)
)

**Evanston Northwestern Healthcare
Corporation,**)
a corporation, and)
)
)

Docket No. 9315

3. Documents relating to:

- a. all wage and benefit plans including but not limited to regular pay, overtime pay, shift pay, bonuses, temporary worker pay, executive compensation, incentive compensation and performance awards, severance



DEFINITIONS

A. The term "the company" or "ENH Medical Group" means the ENH Medical

disclosure, describing, analyzing, identifying or stating

I. The term "health plan" means any entity that contracts for the payment of health services rendered by ENH Medical Group or other physician organizations. This includes, but is not limited to, health maintenance organizations, preferred provider organizations, managed health care plans, point-of-service plans, self-insured health benefit plans, employer or union health plans, or any other entity that contracts for the payment of health services rendered by ENH Medical Group or other physician organizations. This includes, but is not limited to, health maintenance organizations, preferred provider organizations, managed health care plans, point-of-service plans, self-insured health benefit plans, employer or union health plans, or any other entity that contracts for the payment of health services rendered by ENH Medical Group or other physician organizations.

of the person(s) whose files are contained in that box. Documents shall be submitted in sturdy cartons not larger than 1.5 cubic feet, and packed in a manner that reasonably minimizes the cubic footage of the total submission (for example, if a person's files fill only half of a box, place

All other file structures must be converted into sequential format.

- (ii) Record structures. The FTC will accept fixed length records only. All data in the record is to be provided as it

is stored in the file. Numbers should be provided as they are stored in the file. Numbers should be provided as they are stored in the file.

- (b) Magnetically-recorded information from microcomputers:

Computer-based data used in processing documents should be in DOS-text

(5) Virus Checks: Media will be scanned for viruses. Infected media will be returned for replacement.

P. If any documents are withheld from production based on a claim of privilege, provide a statement of the claim of privilege and all facts relied upon in support thereof, in the form of a log that includes each document's authors, addressees, date, a description of each

document, all recipients of the original and any copies, and the specification(s) of this request to which the document is responsive. If the log exists as a computer file(s), provide both the

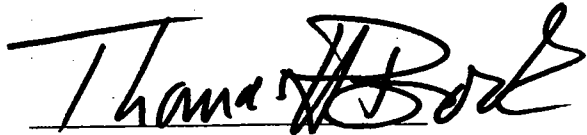
In compliance with the specifications the Company may send the responsive

CERTIFICATE OF SERVICE

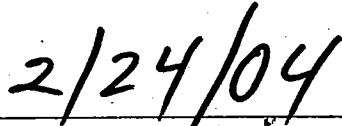
This is to certify that a copy of the foregoing documents were served on counsel for the respondent:

Michael L. Sibarium, Esq.
Winston & Strawn LLP

1400 L Street NW
Washington, DC 20005



Thomas H. Brock
Complaint Counsel



Date



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION