

present and testifying at the trial of this proceeding, all of which objections are reserved and may be interposed at the time of trial.

PHA's custody, possession, or control, and no incidental or implied admissions are intended hereby. PHA's responses are made with the express reservation of all rights pursuant to the Commission's Rules of Practice to supplement and/or amend these responses or otherwise to present evidence later discovered or the significance of which is learned subsequent to the date hereof. Under the terms of the Scheduling Order, Complaint Counsel has the right to issue

1. PHA objects to Complaint Counsel's Requests for Admissions to the extent that

Commission's Rules of Practice. PHA will respond to Complaint Counsel's Requests for Admissions consistent with these rules.

2. PHA objects to Complaint Counsel's Definitions and Instructions to the extent

that they attempt to impose obligations on PHA beyond those contained in the Commission's

Rules of Practice and to ascribe meanings to words that are different from their ordinary meanings.

the PHA member contracts and may do so as a member of a group practice, as a sole

practitioner, or as an employee of one of PHA's participating hospitals.

2. All PHA group practices, other than Doctors Vision Center Family Medicine

Associates of Lincoln County, PLLC, and Lincolntown Medical Group – have at least one office, or place of business, in the Unifour area at which PHA practitioners provide covered services to payors' members.

RESPONSE: PHA objects to the extent that Request for Admission No. 2 to the extent that it is overly broad, vague, ambiguous unduly burdensome, and seeks to impose on PHA a burden greater than that imposed by the Commission's Rules of Practice. PHA cannot truthfully admit

as does this request for admission because Defendant does not have sufficient information

Admission. Admitted to the extent that there are more than 150 practice groups that participate

RESPONSE: PHA objects to the extent that Request for Admission No. 5 to the extent that it is overly broad, vague, ambiguous, unduly burdensome, potentially seeks information that is

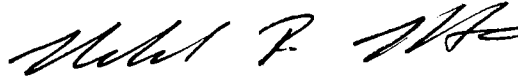
~~protected by the attorney-client and work-product privileges, and seeks to impose on PHA a~~

~~burden greater than that imposed by the Commission's Rules of Practice. PHA cannot truthfully~~

Signed as to Objections:

Date: _____

3/8/04



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ATTORNEYS FOR PHA

CERTIFICATE OF SERVICE

I, Andrea L. Hamilton, hereby certify that on March 8, 2004:

I caused two copies of Respondent Piedmont Health Alliance's Responses And
Objections To Complainant's First Set Of Discovery And Admissions To be served by hand

[REDACTED]

Enclosed a copy of Respondent Piedmont Health Alliance's Responses And

Objections To Complainant Council's First Set Of Requests For Admissions to be served via U.S.

mail delivery to the following person:

Jeffrey Brennan, Esq.
Assistant Director Health Care Services & Products
Bureau of Competition
Federal Trade Commission
601 New Jersey Avenue, N.W.
Washington, D.C. 20580


Andrea L. Hamilton