

UNITED STATES OF AMERICA
BEFORE FEDERAL TRADE COMMISSION

In the Matter of

PIEDMONT HEALTH ALLIANCE, INC.,
a corporation,

and

PETER H. BRADSHAW, M.D.,
S. ANDREWS DEEKENS, M.D.,
DANIEL C. DILLON, M.D.

Docket No. 9314

SANFORD D. GUTTLER, M.D.,
DAVID L. HARVEY, M.D.,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

to further supplement this witness list or circumstantial measurement, in accordance with

3. Ira Bloomfield, M.D.

Dr. Bloomfield is the Chief Medical Information Officer of PHA. It is anticipated that

Mr. Bloomfield will testify regarding:

- the form and function of PHA;
- the operations of PHA.

- the form and function of PHA;
- the operations of PHA;

- the delivery of physician services in the Unifour area and surrounding areas to the extent he is familiar;
- the facts alleged by Complaint Counsel to the extent he has knowledge; and
- the defenses of Respondents, to the extent he has knowledge.

7. Daniel C. Dillon, M.D.

Dr. Dillon, a Respondent, is a member of PHA. It is anticipated that Dr. Dillon may testify regarding:

- the form and function of PHA;
- the operations of PHA;
- his role as a member and Board member of PHA;
- the delivery of physician services in the Unifour area and surrounding areas to the

- the facts alleged by Complaint Counsel to the extent he has knowledge; and
- the defenses of Respondents, to the extent he has knowledge.

8. Diane Fox

Ms. Fox is the Director of Business Development for PHA. It is anticipated that Ms. Fox may testify regarding:

- the form and function of PHA;
- the operations of PHA;

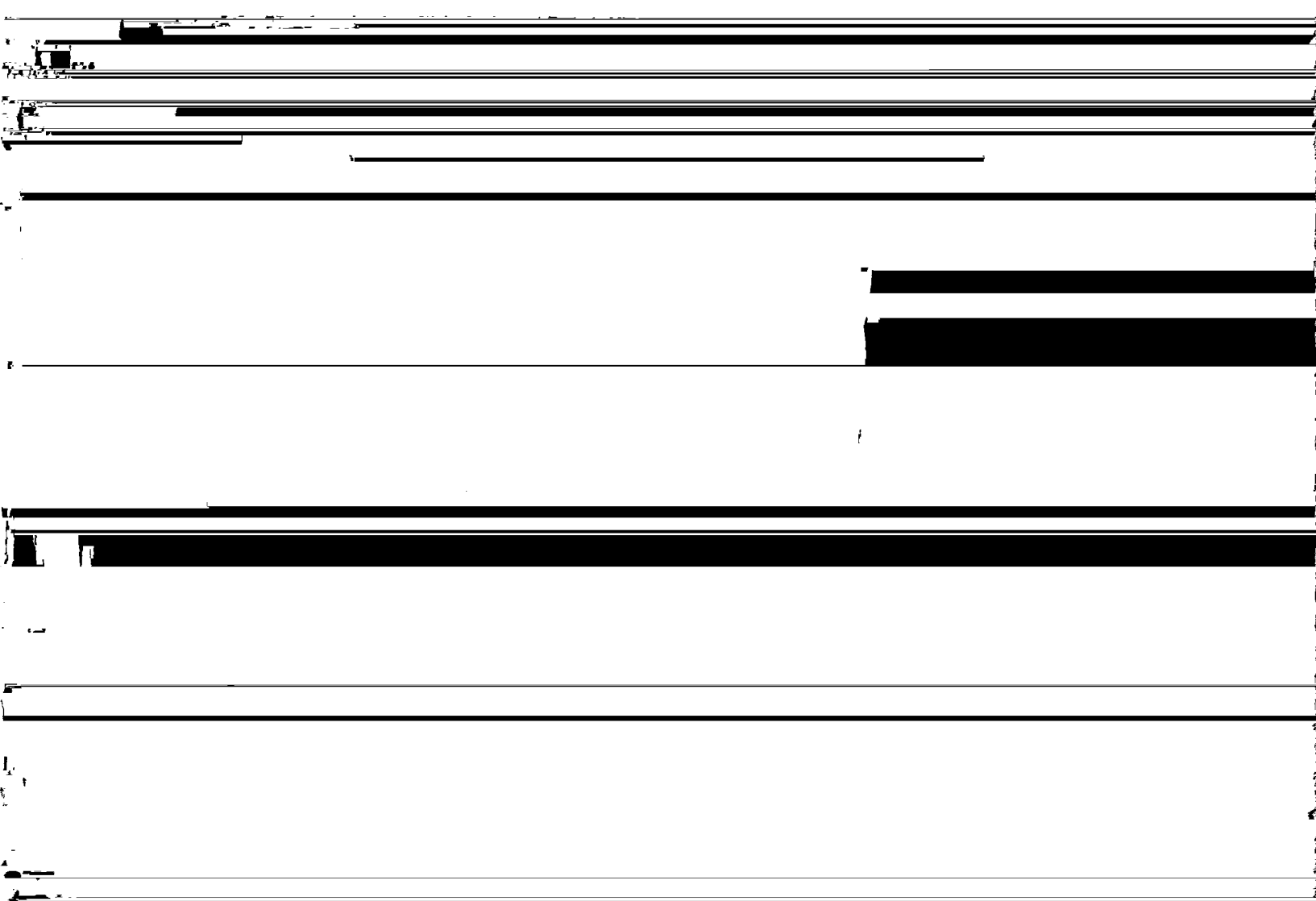
- extent he is familiar;
- the facts alleged by Complaint Counsel to the extent he has knowledge; and
- the defenses of Respondents, to the extent he has knowledge.

10. David L. Harvey, M.D.

Dr. Harvey, a Respondent, is a member of PHA. It is anticipated that Dr. Harvey may testify regarding:

- the form and function of PHA;
- the operations of PHA;
- his role as a member and Board member of PHA;
- the delivery of physician services in the Unifour area and surrounding areas to the extent he is familiar;
- the facts alleged by Complaint Counsel to the extent he has knowledge; and
- the defenses of Respondents, to the extent he has knowledge.

11. James Hughes



- the facts alleged by Complaint Counsel to the extent he has knowledge; and
- the defenses of Respondents, to the extent he has knowledge.

13. Martin Light

Mr. Light is the Director of Project Management of PHA. It is anticipated that Mr. Light may testify regarding:

- the form and function of PHA;
- the operations of PHA;
- PHA's information technology programs;
- the delivery of physician services in the Unifour area and surrounding areas to the extent he is familiar;
- the facts alleged by Complaint Counsel to the extent he has knowledge; and

- the defenses of Respondents, to the extent he has knowledge.

14. John W. Kessel, M.D.

Dr. Kessel, a Respondent, is a member of PHA. It is anticipated that Dr. Kessel may testify regarding:

- the form and function of PHA;
- the operations of PHA;
- his role as a member and Board member of PHA;
- the delivery of physician services in the Unifour area and surrounding areas to the extent he is familiar;
- the facts alleged by Complaint Counsel to the extent he has knowledge; and
- the defenses of Respondents, to the extent he has knowledge.

16. Cathie Pettit

Ms. Pettit is the Chief Operating Officer of PHA. It is anticipated that Ms. Pettit may testify regarding:

- the form and function of PHA;
- the operations of PHA;
- the delivery of physician services in the Unifour area and surrounding areas to the extent she is familiar;
- the facts alleged by Complaint Counsel to the extent she has knowledge; and
- the defenses of Respondents to the extent she has knowledge.

17. A. Gregory Rosenfeld, M.D.

- PHA and its physician members;
- PHA's quality and risk management programs;
- communications with PHA;
- the facts alleged by Complaint Counsel to the extent he has knowledge; and
- the defenses of Respondents, to the extent he has knowledge.

20. James R. Thompson, M.D.

Dr. Thompson, a Respondent, is a member of PHA. It is anticipated that Dr. Thompson may testify regarding:

- the form and function of PHA;
- the operations of PHA;
- his role as a member and Board member of PHA;

extent he is familiar;

- the facts alleged by Complaint Counsel to the extent he has knowledge; and

extent he is familiar;

- the facts alleged by Complaint Counsel to the extent he has knowledge and

- the defenses of Respondents, to the extent he has knowledge.

Dated: March 9, 2004

Respectfully submitted,

By: 

James H. Sneed

Nicholas R. Koberstein

Linda M. Holleran

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Christine L. White

CERTIFICATE OF SERVICE

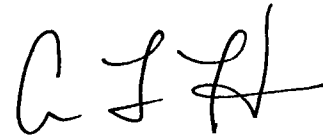
I, Andrea L. Hamilton, hereby certify that on March 9, 2004:

I caused to be prepared and filed with the Clerk of the Court, the following:

[REDACTED]

I caused a copy of Respondent Piedmont Health Alliance's Preliminary Witness List, 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