

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION



[REDACTED]

In the Matter of)
)
North Texas Specialty Physicians,)
Respondent.)

Docket No. 9312

production and that NTSP designated well over 4,000 pages of documents as "not responsive."

designations and shall narrow those designations to include only those documents for which

NTSP has a good faith basis it intends to use at trial. Exhibits or designations of documents that are duplicates of the same document with different bates numbers are not allowed. With respect to deposition testimony, it is not sufficient to designate an entire deposition transcript.

The designation letters Respondent provided to nonparty payors with respect to documents or information designated by the nonparty payors as "restricted confidential, attorney eyes only" provide bates numbers for all documents designated as such.

that Respondent intends to disclose those documents at trial to (1) expert witnesses, (2) employees or representatives of the specific nonparty never to whom the letter was sent, and (3)