UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION

It is Respondents understanding that any extension that the Court may afford Unicare to file it's motion would not impact Unicare's commitment to make a rolling production of documents responsive to the Subpoena as quickly as possible. As a result, although Respondents would agree to a reasonable extension and do not oppose Unicare's request for some additional time, we suggest a seven (7) day extension would be sufficient. Respondents will continue to work with Unicare to resolve any questions or concerns regarding the breadth of the Subpoena.

Respondents have been diligently working with all third parties subpoenaed in this matter in an effort to resolve discovery disputes without involving the Court in time-consuming motion practice. Respondents recognize the right [redacted]

[redacted]

Order and thus are encouraging the rolling production of third party materials as soon as possible. Information in the [redacted]

documents and numerous cd-roms containing data as well as 25 deposition transcripts, until

CERTIFICATE OF SERVICE

I hereby certify that on May 12, 2004, a copy of the foregoing [redacted]