





subpoena to it, as well as in arranging for the production of documents in the most logical manner, and counsel for UNICARE has indicated as much to counsel for Respondents. It is not correct, however, that counsel for UNICARE has made any “commitment to make a rolling production of documents responsive to the subpoena.” Counsel for UNICARE has told both counsel for Respondents and counsel for the FTC that it needs to review this matter prior to discussing ways in which the parties may agree to limit the subpoena and arrange for the production of documents.

For all of these reasons, UNICARE requests that, at a minimum, it be granted an extension until May 24, 2004, in which to file its Motion to Quash or Limit the Subpoena Duces Tecum served upon it.

Respectfully submitted,

CHITTENDEN, MURDAY & NOVOTNY LLC

By: \_\_\_\_\_  
One of the Attorneys for **UNICARE HEALTH  
PLANS OF THE MIDWEST, INC.**

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## CERTIFICATE OF SERVICE

I, Elizabeth G. Doolin, hereby certify that on May 13, 2004, I caused copies of:

Non-Party UNICARE Health Plans of the Midwest, Inc.'s Reply in Support of its Motion for Extension of Time

to be served upon the following persons:

Office of the Secretary  
Federal Trade Commission  
Room H-159  
600 Pennsylvania Avenue, NW  
Washington, DC 20580  
*(Original and 12 copies served via FedEx overnight delivery, and electronic copies served via e-mail)*

The Honorable Stephen J. McGuire  
Chief Administrative Law Judge  
Federal Trade Commission  
Room H-106  
600 Pennsylvania Avenue, NW  
Washington, DC 20580  
*(Two courtesy copies served via FedEx overnight delivery)*

Thomas H. Brock, Esquire  
Federal Trade Commission  
Room H-374  
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Washington, DC 20580  
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Philip M. Eisenstat, Esquire  
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601 New Jersey Avenue, NW  
Washington, DC 20580  
*(Served via FedEx overnight delivery)*

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**Elizabeth G. Doolin**

**ELECTRONIC COPY CERTIFICATION**

**UNICARE HEALTH PLANS OF THE MIDWEST**, by and through its attorneys, hereby certifies that an electronic copy of the following:

Non-Party UNICARE HEALTH PLANS OF THE MIDWEST, INC.'s  
Reply in Support of its Motion for Extension of Time

is a true and correct copy of the paper original, and that a paper copy, with original signature, has been filed with the Secretary of the Federal Trade Commission this same day via Federal Express Overnight Delivery sent on May 13, 2004.

**Dated: May 14, 2004.**