

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

In the Matter of)
)
)

Evanston Northwestern Healthcare
Corporation,)
a corporation, and)
)

ENH Medical Group, Inc.,)
a corporation.)
)

Docket No. 9315

Public Filing

AFFIDAVIT OF MICHAEL ABBENE

employee for one month, or approximately 176 hours for each. The average hourly wage/salary for the current employee would approximate \$ 19.00. The average hourly cost for the temporary employee would approximate \$ 15.00. The total wage/salary/cost would approximate \$6,000, and I cannot estimate the copying costs.

Michael P. Akh...

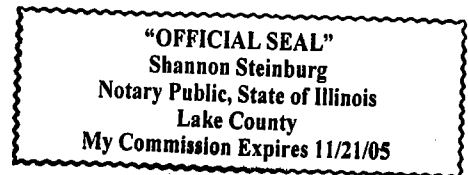
Michael Akh...

Subscribed and sworn to before me this

1st day of June 2004.

Shannon Steinburg
Notary Public

My Commission Expires: 11-21-05



Richard G. Schultz (rschultz@scgk.com)
Franklin S. Schwerin (fschwerin@scgk.com)
Schwartz, Cooper, Greenberger & Krauss, Chtd.
180 North LaSalle Street, Suite 2700
Chicago, IL 60601
Phone: (312) 346-1300
Fax: (312) 782-8146

UNITED STATES OF AMERICA

In the Matter of)

Evanston Northwestern Healthcare)
Corporation,)

a corporation, and)

ENH Medical Group, Inc.,)

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AFFIDAVIT OF DIANA N. BLUH

I, Diana N. Bluh, being first duly sworn, hereby state the following under oath, based on my personal knowledge:

1. I am an Account Associate in the Sales Department with Great-West Life & Annuity Insurance Company.

2. I have reviewed the subpoena served upon Great-West Healthcare of Illinois, Inc. in this matter by Evanston Northwestern Healthcare Corporation and ENH Medical Group, Inc.,

another employee approximately 60 hours to review and produce the same. (40 hours for one employee and 20 hours for another) The average hourly wage/salary for the employees would approximate \$22.50. The total wage/salary/cost would approximate \$1,350. Further, we maintain our proposals at off-site storage. To retrieve a box, we are charged \$5 per box and another \$5 to return and restock. The number of boxes is not determinable at this time. I cannot estimate the copying costs.

Diana N. Bluh
Diana N. Bluh

~~Subscribed and sworn to before me this~~

3RD day of June, 2004.

Teresa C. Bishop
Notary Public

My Commission Expires:

Notary Public, Cobb County, Georgia

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AFFIDAVIT OF LORI EARNEST

I, Lori Earnest, being first duly sworn, hereby state the following under oath, based on:

my personal knowledge:

1. I am a Technical Manager in the Integration and Information Data Services

Department of Great West Life & Accident Insurance Company, One North Dearborn Street, Chicago, Illinois 60610

platform. Denver platform claim data is available from 1998 to the present. St. Louis platform claim data is available from August 1999 to the present.

4. Many of the specific requests are not available. For example, "admitting

physician" is not available through a computer search; the facility name is on the claim record,

physician name is not available. The physician name is available on the claim record.

Richard C. Schultz (rschultz@earthlink.net)

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Docket No. 9315

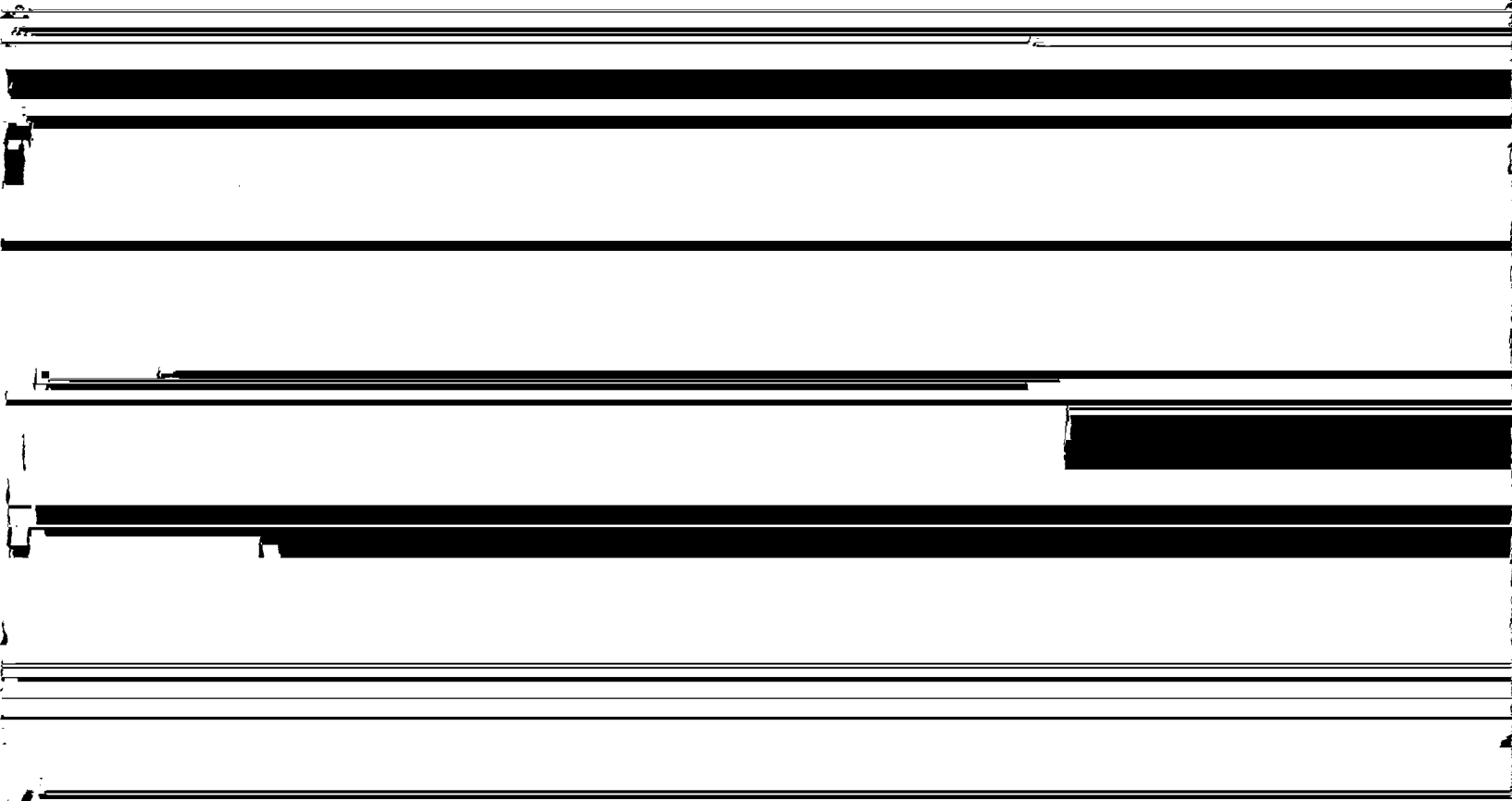
Public Filing

AFFIDAVIT OF DAVID LIVINGSTON

I, David Livingston, being first duly sworn, hereby state the following under oath, based on my personal knowledge:


1. I am employed by Great-West Life & Annuity Insurance Company in the Healthcare Management Department.

2. I am employed by Great-West Life & Annuity Insurance Company in the Healthcare Management Department.



the temporary employee would approximate \$20,000. The total wage/salary/cost would

approximate \$23,000. Copying costs cannot be estimated at this time.



David Livingston

Subscribed and sworn to before me this

~~1-17-11~~ 1-17-2011

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION**

In the Matter of)
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Corporation,)
a corporation, and)
_____)

Docket No. 9315

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_____)
a corporation.)
_____)

AFFIDAVIT OF WILLIAM PATTEN

approximate \$31.25. The average hourly cost for the temporary employee would approximate \$31.25. The total wage/salary/cost would approximate \$14,000, and the copying costs would approximate \$11,200.

William Patten

William Patten

Subscribed and sworn to before me this
27th day of May, 2004.

Debra A. Murphy

Notary Public
My Commission Expires: 01/01/07



**UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION**

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Evanston Northwestern Healthcare _____)
Corporation, _____)
a corporation, and _____)
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ENH Medical Group, Inc., _____)
a corporation. _____)
_____)

Docket No. 9315

Public Filing

AFIDAVIT OF KIM STIELOW

I, Kim Stielow, being first duly sworn, hereby state the following under oath, based on my personal knowledge:

1. I am employed by Great-West Life & Annuity Insurance Company in the Products/Marketing Department.
2. I have reviewed the subpoena served upon Great-West Healthcare of Illinois, Inc. in this matter by Evanston Northwestern Healthcare Corporation and ENH Medical Group, Inc., ~~participating in paragraphs 5, 17, 22 and 29. I have made a determination as to the costs and~~

PAGE 2



Kim Stielow

Subscribed and sworn to before me this
27 day of May, 2004.



Notary Public



My Commission Expires:

9-2-2007

Richard G. Schultz (rschultz@scgk.com)
Franklin S. Schwerin (fschwerin@scgk.com)
Schwartz, Cooper, Greenberger & Krauss, Chtd.
180 North LaSalle Street, Suite 2700
Chicago, IL 60601
Phone: (312) 346-1300
Fax: (312) 782-8146