

responding to the Subpoena could approach \$50,000, with the exact cost dependent (a) on the ultimate agreement between Great-West Health Care and Respondents as to the documents to be produced pursuant to the Subpoena, and (b) on any orders entered herein with respect to the

subpoena so that compliance with the subpoena does not impose significant expense on the non-party. *Linder v. Calero-Portocarrero*, 251 F. 3d 178, 182 (D.C. Cir. 2001).

6. It would be appropriate and reasonable to require Respondents to reimburse Great-West Healthcare for its hourly costs in locating and assembling the documents for copying

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

CERTIFICATE OF SERVICE

I hereby certify that on June 3, 2004, a copy of the foregoing Motion For Cost Reimbursement was served by overnight courier delivery on:

The Honorable Stephen J. McGuire
Chief Administrative Law Judge
Federal Trade Commission
600 Pennsylvania Ave., N.W. (H-106)
Washington, DC 20580

Thomas H. Brock, Esq.
Federal Trade Commission
600 Pennsylvania Ave., N.W. (H-374)
Washington, DC 20580

Philip M. Eisenstat, Esq.
Federal Trade Commission
601 New Jersey Avenue., N.W.
Room NJ-5235
Washington, DC 20580

Chul Pak, Esq.
Assistant Director Mergers IV
Federal Trade Commission
601 New Jersey Avenue, N.W. (NJ-5238)
Washington, DC 20580

and by messenger on:

David Dahlquist, Esq.
Winston & Strawn, LLP
35 West Wacker Drive
Chicago, IL 60601

/S/ Franklin S. Schwerin
Franklin S. Schwerin

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

Prepared By:

Franklin S. Schwerin
Schwartz, Cooper, Greenberger & Krauss, Chtd.
180 North LaSalle Street, Suite 2700
Chicago, IL 60601
Phone: (312) 346-1300
Fax: (312) 782-8416
E-mail: fschwerin@scgk.com

