# UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION

	)	
In the Matter of	)	
	)	Docket No. 9315
	)	(Public Record Version)

- laws of the State of Illinois, with its principal place of business located at 1301 Central Street, Evanston, Illinois 60201.
- 2. "Highland Park" means Highland Park Hospital, including its past or surviving parents, subsidiaries and affiliates, a hospital located near Evanston, Illinois.

- 05177. The amendment is a business record of one or both parties to the amendment.

  The amendment is admissible into evidence in this matter.
- 1702. The document attached to this Request for Admissions as Exhibit CX-05179 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05177. The [REDACTED] amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
- 1703. The document attached to this Request for Admissions as Exhibit CX-05180 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05177. The amendment is a business record of one or both parties to the amendment.

  The amendment is admissible into evidence in this matter.
- 1704. The document attached to this Request for Admissions as Exhibit CX-05181 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05177. The [REDACTED] amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
- 1705. The document attached to this Request for Admissions as Exhibit CX-05182 is authentic, genuine, and a true and correct copy of an amendment (plus an [REDACTED] memorandum and a related document), effective [REDACTED], to CX-05177. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
- 1706. The document attached to this Request for Admissions as Exhibit CX-05183 is authentic, genuine, and a true and correct copy of an amendment (plus two letters), effective [REDACTED], to CX-05177. The amendment is a business record of one or both

- parties to the amendment. The amendment is admissible into evidence in this matter.
- 1707. Exhibits CX-05177 through CX-05183 constitute an authentic, genuine, true and correct copy of the complete set of the [REDACTED] contracts and amendments (plus a memorandum, two letters, and another document) between [REDACTED] and Highland Park from [REDACTED]. This set of exhibits is admissible into evidence in this matter.
- 1708. The document attached to this Request for Admissions as Exhibit CX-05184 is authentic, genuine, and a true and correct copy of a termination notice, effective [REDACTED], to CX-05177. The [REDACTED] termination notice is a business record of one or both parties to the termination notice. The termination notice is admissible into evidence in this matter.
- 1709. Exhibit CX-05184 constitutes an authentic, genuine, true and correct copy of the complete set of the termination notices between [REDACTED] and Highland Park from [REDACTED]. This set of an exhibit is admissible into evidence in this matter.
- 1710. The document attached to this Request for Admissions as Exhibit CX-05185 is authentic, genuine, and a true and correct copy of a consent to assignment, effective [REDACTED].

  The consent to assignment is a business record of one or both parties to the consent to assignment. The consent to assignment is admissible into evidence in this matter.
- 1711. Exhibit CX-05185 constitutes an authentic, genuine, true and correct copy of the complete set of the consents to assignment between [REDACTED] and Highland Park from [REDACTED]. This set of an exhibit is admissible into

evidence in this matter.

#### **Evanston Northwestern Healthcare**

[REDACTED]

#### [REDACTED]

- 1712. The document attached to this Request for Admissions as Exhibit CX-05186 is authentic, genuine, and a true and correct copy of a contract between [REDACTED] and Evanston Northwestern Healthcare, effective [REDACTED]. The contract is a business record of one or both contracting parties. The contract is admissible into evidence in this matter.
- 1713. The document attached to this Request for Admissions as Exhibit CX-05187 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05186. The amendment is a business record of one or both parties to the amendment.

  The amendment is admissible into evidence in this matter.
- 1714. The document attached to this Request for Admissions as Exhibit CX-05188 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05186. The amendment is a business record of one or both parties to the amendment.

  The amendment is admissible into evidence in this matter.
- 1715. The document attached to this Request for Admissions as Exhibit CX-05189 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05186. The [REDACTED] amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
- 1716. The document attached to this Request for Admissions as Exhibit CX-05190 is authentic,

- [REDACTED], to CX-05186. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
- 1722. The document attached to this Request for Admissions as Exhibit CX-05196 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05186. The amendment is a business record of one or both parties to the amendment.

  The amendment is admissible into evidence in this matter.
- 1723. The document attached to this Request for Admissions as Exhibit CX-05197 is authentic, genuine, and a true and correct copy of an amendment (plus a cover letter), effective [REDACTED] to CX-05186. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
- 1724. The document attached to this Request for Admissions as Exhibit CX-05198 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05186. The amendment is a business record of one or both parties to the amendment.

  The amendment is admissible into evidence in this matter.
- 1725. The document attached to this Request for Admissions as Exhibit CX-05199 is authentic, genuine, and a true and correct copy of an amendment (plus a cover letter), effective [REDACTED], to CX-05186. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
- 1726. Exhibits CX-05186 through CX-05199 constitute an authentic, genuine, true and correct copy of the complete set of the [REDACTED] contracts and amendments (plus some attached papers) between [REDACTED] and Evanston Northwestern Healthcare issued from [REDACTED]. This set of exhibits is admissible

- into evidence in this matter.
- 1727. The document attached to this Request for Admissions as Exhibit CX-05200 is authentic, genuine, and a true and correct copy of an amendment (plus a cover memorandum), effective [REDACTED], to CX-05186. The [REDACTED] amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
- 1728. The document attached to this Request for Admissions as Exhibit CX-05201 is authentic, genuine, and a true and correct copy of an amendment (plus a fax transmittal sheet), signed on [REDACTED], to CX-05186. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
- 1729. The document attached to this Request for Admissions as Exhibit CX-05202 is authentic, genuine, and a true and correct copy of an amendment (plus an attached page), effective [REDACTED], to CX-05186. The [REDACTED] amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
- 1730. The document attached to this Request for Admissions as Exhibit CX-05203 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05186. The [REDACTED] amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
- 1731. Exhibits CX-05200 through CX-05203 constitute an authentic, genuine, true and correct copy of the complete set of the [REDACTED] contracts and amendments (plus some

attached papers) between [REDACTED] and Evanston Northwestern Healthcare issued from [REDACTED]. This set of exhibits is admissible into evidence in this matter.

[REDACTED]

- amendments between [REDACTED] and Evanston Northwestern Healthcare issued from [REDACTED]. This set of exhibits is admissible into evidence in this matter.
- 1737. The document attached to this Request for Admissions as Exhibit CX-05200 is authentic, genuine, and a true and correct copy of an amendment (plus a cover memorandum), effective [REDACTED], to CX-05186. The [REDACTED] amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
- 1738. Exhibit CX-05200 constitutes an authentic, genuine, true and correct copy of the complete set of the [REDACTED] contracts and amendments (plus a cover memorandum) between [REDACTED] and Evanston Northwestern Healthcare issued from [REDACTED]. This set of an exhibit is admissible into evidence in this matter.

- Healthcare issued from [REDACTED]. This set of exhibits is admissible into evidence in this matter.
- 1741. The document attached to this Request for Admissions as Exhibit CX-05185 is authentic, genuine, and a true and correct copy of a consent to assignment, effective [REDACTED].

  The consent to assignment is a business record of one or both parties to the consent to assignment. The consent to assignment is admissible into evidence in this matter.
- 1742. Exhibit CX-05185 constitutes an authentic, genuine, true and correct copy of the complete set of the consents to assignment between [REDACTED] and Evanston Northwestern Healthcare from [REDACTED]. This set of an exhibit is admissible into evidence in this matter.

### [REDACTED]

- 1743. The document attached to this Request for Admissions as Exhibit CX-05208 is authentic, genuine, and a true and correct copy of a contract between [REDACTED] and Evanston Northwestern Healthcare, made on [REDACTED]. The [REDACTED] contract is a business record of one or both contracting parties. The contract is admissible into evidence in this matter.
- 1744. The document attached to this Request for Admissions as Exhibit CX-05209 is authentic, genuine, and a true and correct copy of an amendment (plus a letter), effective [REDACTED] to CX-05208. The [REDACTED] amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
- 1745. Exhibits CX-05208 through CX-05209 constitute an authentic, genuine, true and correct

copy of the complete set of the [REDACTED] contracts and amendments (plus a letter) between [REDACTED] and Evanston Northwestern Healthcare from [REDACTED].

This set of exhibits is admissible into evidence in this matter.

- 1746. The document attached to this Request for Admissions as Exhibit CX-05210 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05208. The amendment is a business record of one or both parties to the amendment.

  The amendment is admissible into evidence in this matter.
- 1747. Exhibits CX-05208 through CX-05210 constitute an authentic, genuine, true and correct copy of the complete set of the [REDACTED] contracts and amendments (plus a letter) between [REDACTED] and Evanston Northwestern Healthcare from [REDACTED].

  This set of exhibits is admissible into evidence in this matter.

Attachments

Thomas Brock
Philip Eisenstat
Paul Nolan
Renée Henning
Nancy Park
Counsel Supporting the Complaint
Bureau of Competition
Federal Trade Commission
Washington, D.C. 20580
Telephone (202) 326-2813
Facsimile (202) 326-2884

Dated: \_\_\_\_\_, 2004

## **CERTIFICATE OF SERVICE**

This is to certify that on, 2004	, I caused a copy of the foregoing to be served
upon counsel for the respondents by electronic m	ail and first class mail delivery:
Michael Sibarium, Esquire WINSTON & STRAWN 1400 L Street, N.W. Washington, D.C. 20005  Charles Klein, Esquire WINSTON & STRAWN 1400 L Street, N.W. Washington, D.C. 20005	
Duane Kelley, Esquire WINSTON & STRAWN 35 West Wacker Drive Chicago, IL 60601  Michael T. Hannafan, Esquire Michael T. Hannafan & Associates, Ltd. One East Wacker Drive Suite 1208 Chicago, IL 60601	
and delivery of two copies to:	
The Honorable Stephen J. McGuire Federal Trade Commission 600 Pennsylvania Avenue Room 113 Washington, D.C. 20580	
	Thomas Brock