

all amendments, appendices, and related documents reflecting any contract terms,” dating back to *January 1, 1992*. See Subpoena at 6 (emphasis added). As just another example, request number 22 seeks production of “[*a*ll print advertisements and the texts of *any* radio or television advertisements that refer or relate to *any health care facility*.” *Id.* at 11. Such requests are not only overly broad but place an enormous burden on First Health, which would have to manually

search for those materials.

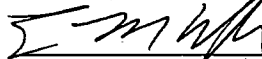
severely delay this litigation and burden First Health Petitioners, and the Court. A short

extension of time, however, will allow the parties to reach an amicable agreement with respect to the outstanding discovery disputes, thereby expediting the production of documents by First Health to Respondents.

WHEREFORE, for the foregoing reasons, First Health respectfully requests that the deadline for its Opposition to Respondents' Motion to Compel be extended until October 1, 2004.

DATED: September 9, 2004

Respectfully Submitted,



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CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2004, a copy of the foregoing Memorandum In
Re: Third Party First Health's Motion For Extension of Time to Oppose Respondents'

[REDACTED]