

UNITED STATES OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION

~~CONFIDENTIAL - ATTORNEY WORK PRODUCT~~

In the matter of )  
)  
)

**Evanston Northwestern Healthcare** )  
Corporation )

Docket No. 0315

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

**Public Record Version**

**RESPONDENTS' FIRST AMENDED ANSWERS AND OBJECTIONS TO  
COMPLAINT COUNSEL'S FIRST SET OF INTERROGATORIES**

Pursuant to the Federal Trade Commission's Rules of Practice ("Rules"), 16 C.F.R. §  
3.31(e)(2), Respondents Evanston Northwestern Healthcare Corporation ("ENH") and ENH

34. Identify each instance in which the Evanston Healthcare Network terminated the employment of a person employed by Respondent Hospital(s) and, in each such instance, identify the grounds for the termination.

**ANSWER:** Respondents object to this interrogatory on the grounds that it is overbroad and unduly burdensome. Respondents also object on the ground that this interrogatory cannot reasonably be expected to yield information relevant to the allegations of the Complaint, to the proposed relief, or to the defenses of Respondents. Respondents further object on the ground that the burden of deriving or ascertaining the answer to this interrogatory is substantially the same for Complaint Counsel as for Respondents. *See* 16 C.F.R. § 3.35©.

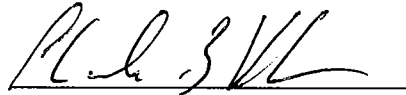
Notwithstanding and subject to these objections and the General Objections listed in

[REDACTED]

35. Identify each instance in which Respondent Hospital(s) deferred or decided to forgo capital or operational expenditures because these expenditures were not approved by

[REDACTED]

Respectfully Submitted,



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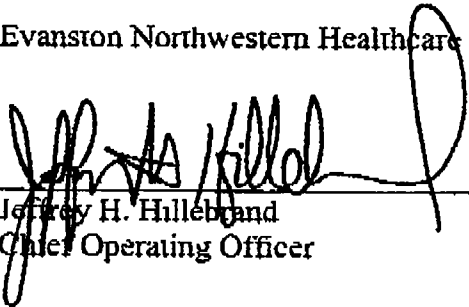
*Counsel for Respondents*

VERIFICATION

I declare under penalty of perjury under the laws of the United States of America that the

foregoing is true and correct to the best of my knowledge and recollection. Executed on this  
19<sup>th</sup> day of November 2004.

Evanston Northwestern Healthcare Corporation

  
\_\_\_\_\_  
Jeffrey H. Hillebrand  
Chief Operating Officer

**CERTIFICATE OF SERVICE**

I hereby certify that on November 19, 2004, a copy of the foregoing *Respondents' First Amended Answers and Objections to Complaint Counsel's First Set of Interrogatories* was served by email and first class mail, postage prepaid, on:

The Honorable Stephen J. McGuire

Chief Administrative Law Judge  
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