

FEDERAL TRADE COMMISSION
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ATTORNEY GENERAL

- f. To move to admit designated deposition testimony in lieu of live testimony for any witness who is unavailable to testify at trial.



5. Jeffrey Hillebrand – ENH’s Chief Operating Officer. Mr. Hillebrand may be called to testify about, without limitation, legacy ENH, legacy HPH, the Northwestern Healthcare Network (“NHN”), the merger, the accomplishments of the merger, the pertinent competitive landscape, the relationships between ENH and managed care organizations,

~~the relationships between ENH and managed care organizations,~~

10. Mark Neaman – ENH’s Chief Executive Officer. Mr. Neaman may be called to testify about, without limitation, legacy ENH, legacy HPH, ENH Medical Group, the NHN, the merger, the accomplishments of the merger, the pertinent competitive landscape, the

relationship between ENH and managed care organizations, the relationship between ENH and local employers, the impact on the community of the remedy proposed by

~~Complaint Counsel matters addressed in his deposition and other related topics~~

contextual and other information related to ENH or ENH Medical Group, and documents that may appear on Respondents’ exhibit list.

11. Mary O’Brien – HPH’s President. Ms. O’Brien may be called to testify about, without limitation, legacy ENH, legacy HPH, the NHN, the merger, post-merger HPH, the accomplishments of the merger, the impact on the community of the remedy proposed by

~~Complaint Counsel matters addressed in her deposition and other related topics~~

contextual and other information related to ENH or ENH Medical Group, and documents that may appear on Respondents’ exhibit list.

16. Thomas A. Victor, M.D. – ENH Chairman of Laboratory and Pathology Medicine. Dr.

22. Lou Porn – Deloitte Consulting. Mr. Porn may be called to testify about ENH’s engagement of Deloitte & Touche concerning its evaluations of the merger and of ENH’s pricing matters addressed in his deposition and other related topics, contextual and other

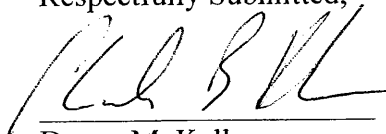
26 Joseph Arango—Director of Provider Contracting and Strategy, Blue Cross and Blue

Shield. Mr. Arango may be called to testify about, without limitation, the operations of Blue Cross and Blue Shield of Illinois, contracting for general acute care hospital services, the contracts and contract negotiations between FNU, IDL, C... 4

OTHER FACT WITNESSES

30. Mayor Michael Belsky – Current Mayor of Highland Park and member of the Highland Park Healthcare Foundation. Mayor Belsky may be called to testify, without limitation, the HPH Foundation, the effect of the merger on the Highland Park community, the impact on the community of the remedy proposed by Complaint Counsel, matters addressed in his deposition and other related topics, contextual and other information related to ENH or ENH Medical Group, and documents that may appear on Respondents' exhibit list.

Respectfully Submitted,



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Attorneys for Respondents

January 28, 2005

CERTIFICATE OF SERVICE

I hereby certify that on January 28, 2005, a copy of the foregoing Respondents' Revised Final Proposed Witness List was served by email and first class mail, postage prepaid, on:

Honorable Stephen J. McGuire
Chief Administrative Law Judge

Washington, DC 20580
(courtesy copy only by messenger)

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