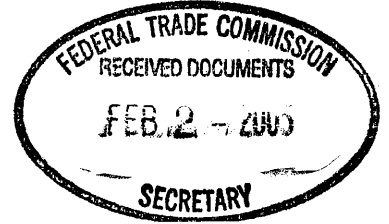


UNITED STATES OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION



\_\_\_\_\_  
In the Matter of )  
)

Evanston Northwestern Healthcare )  
Corporation, and )

ENH Medical Group, Inc. )  
)  
)  
)  
\_\_\_\_\_ )

) Docket No. 9315

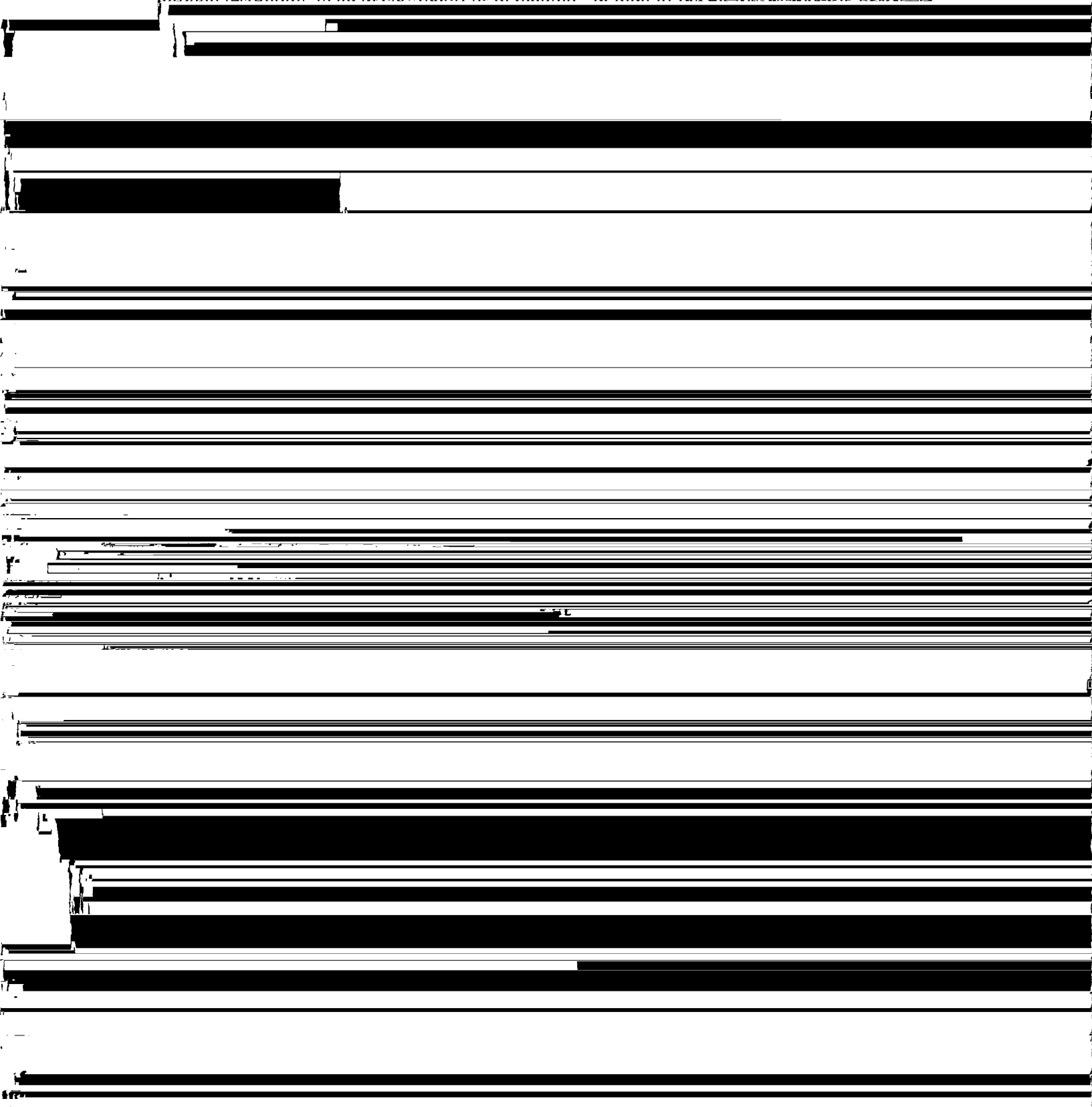
**THIRD-PARTY BLUE CROSS BLUE SHIELD OF ILLINOIS' MOTION FOR LEAVE  
TO FILE A RENEWED MOTION FOR *IN CAMERA* TREATMENT, IF NECESSARY  
AFTER FEBRUARY 2, 2005**

~~Third-Party Blue Cross Blue Shield of Illinois ("BCBSI") hereby provides notice to the~~

Administrative Law Judge that it will not file a renewed motion for *in camera* treatment of proposed trial exhibit No. CX 3022 at this time. However, BCBSI seeks leave to renew its motion for *in camera* treatment with respect to its data after February 2, 2005, if either party seeks to introduce such data into evidence either directly through testimony or in rebuttal.

Pursuant to the Court's Order, BCBSI counsel contacted counsel for both parties and learned that neither would be including the Data Files on its final exhibit list. *See* Exh. 2.

However, both parties left open the possibility that BCBSI data might be introduced during trial through testimony, in an expert report or in rebuttal. In light of the parties' respective decisions



# **EXHIBIT 1**



Disc No.	Bates Number	Data File	Description
		POS1199.FTM POS1298.FTM POS1299.FTM PPO0198.FTM PPO0199.FTM PPO0298.FTM PPO0299.FTM PPO0398.FTM PPO0399.FTM PPO0498.FTM	
2	BCBSI 25150	PPO0499.FTM PPO0598.FTM PPO0599.FTM PPO0698.FTM PPO0699.FTM PPO0798.FTM PPO0799.FTM PPO0898.FTM PPO0899.FTM	Contain confidential PPO April 1998-August 1999 claim and reimbursement data.
3	BCBSI 25151	PPO0999.FTM PPO1098.FTM PPO1099.FTM	Contain confidential PPO September 1998-December 1999

Disc No.	Bates Number	Data File	Description
		POS0600.FTM POS0700.FTM POS0800.FTM POS0900.FTM POS1000.FTM POS1100.FTM POS1200.FTM PPO0100.FTM PPO0200.FTM PPO0300.FTM PPO0400.FTM PPO0500.FTM	
5	BCBSI 25153	PPO0600.FTM PPO0700.FTM	Contain confidential PPO June-

Disc No.	Bates Number	Data File	Description
		PPO0501.FTM	
7	BCBSI 25155	PPO0601.FTM PPO0701.FTM PPO0801.FTM PPO0901.FTM	Contain confidential PPO June-September 2001 claim and reimbursement data.
8	BCBSI 25156	PPO0601.FTM PPO0701.FTM PPO0801.FTM PPO0901.FTM	Contain confidential PPO Files 10, 11, 12/2000 claim and reimbursement data.
9	BCBSI 25157	PMRC0202.FTM PMRC0202.FTM	Contain confidential PMRC 2002, PMRC 2002, PMRC 2002

Disc No.	Bates Number	Data File	Description
12	BCBSI 25160	PPO1102.FTM PPO1202.FTM	Contain confidential PPO November -December 2002 claim and reimbursement data.
13	BCBSI 25161	PMRC0203.FTM PMRC0303.FTM PMRC0403.FTM PMRC0603.FTM PMRC0703.FTM POS0103.FTM POS0203.FTM POS0303.FTM POS0403.FTM POS0503.FTM POS0603.FTM POS0703.FTM PPO0103.FTM PPO0203.FTM	Contain confidential POS, PMRC 1-7/2003 and PPO January - February 2003 claim and reimbursement data.
14	BCBSI 25162	PPO0303.FTM PPO0403.FTM PPO0503.FTM	Contain confidential PPO March - May 2003 claim and reimbursement data.
15	BCBSI 25163	PPO0603.FTM PPO0703.FTM	Contain confidential PPO June-July 2003 claim and reimbursement data.



Disc No.	Bates Number	Data File	Description
		CLM99Q02.TXT CLM99Q03.TXT CLM99Q04.TXT CLM00Q01.TXT CLM00Q02.TXT CLM00Q03.TXT CLM00Q04.TXT CLM01Q01.TXT CLM01Q02.TXT CLM01Q03.TXT CLM01Q04.TXT CLM02Q1.DAT CLM02Q2.DAT CLM02Q3.DAT CLM02Q4.DAT CCMO3Q01.TXT CLM03Q02.TXT CLM03Q03.TXT PPO0998.FTM PPO1001.FTM PPO1101.FTM PPO1201.FTM	

# EXHIBIT 2

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**KIRKLAND & ELLIS LLP**

AND AFFILIATED PARTNERSHIPS

200 East Randolph Drive  
Chicago, Illinois 60601

Catherine Fazlo  
To Call Writer Directly:

312 861-2000

Facsimile:

January 31, 2005

Via Facsimile

Jeff Dahnke  
Complaint Counsel  
Federal Trade Commission  
Bureau of Competition  
601 New Jersey Avenue, NW  
Washington, DC 20001

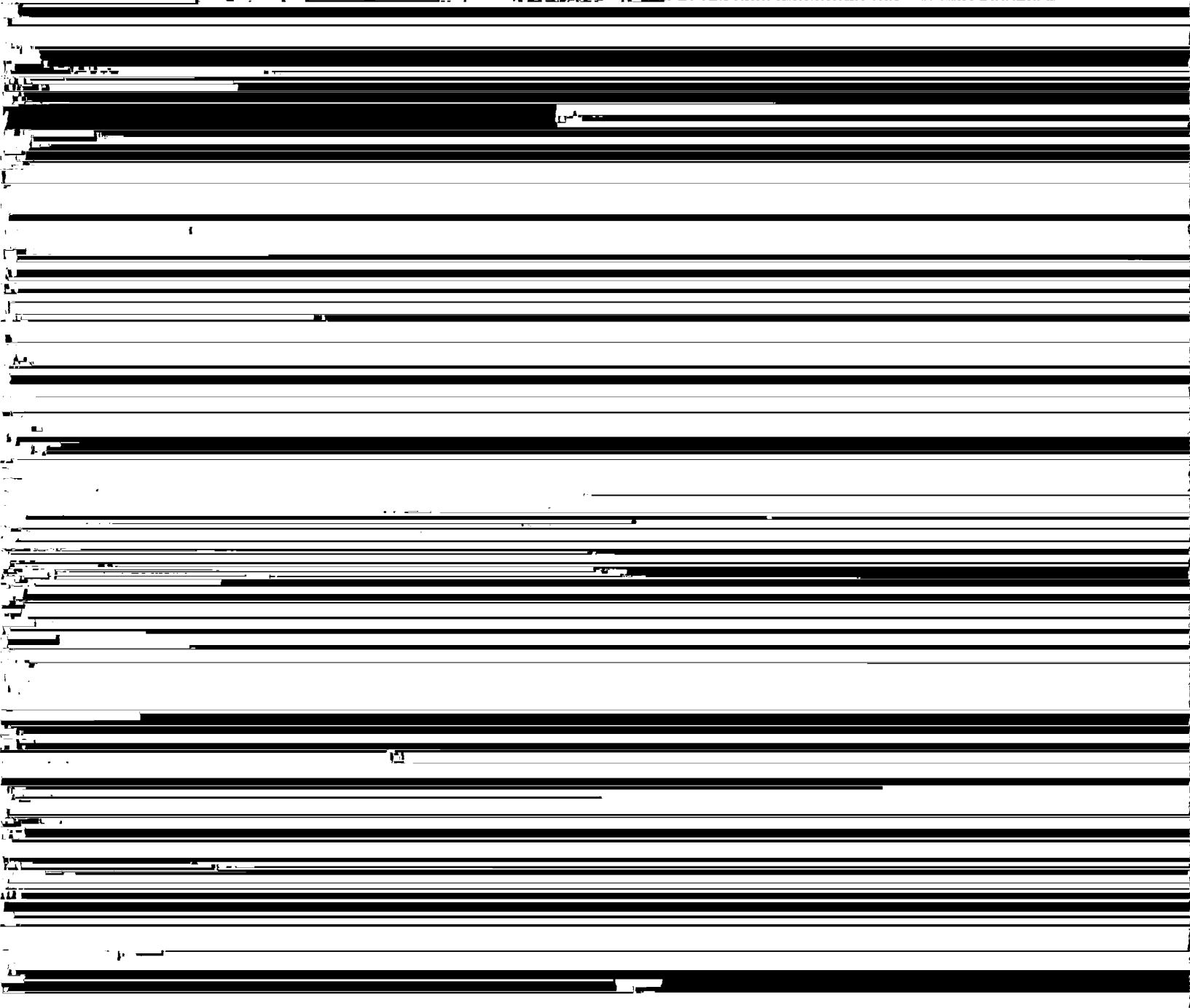
Charles B. Klein  
Respondent Counsel  
Winston & Strawn LLP  
1400 L Street, NW  
Washington, DC 20005

Re: In the Matter of Evanston Northwestern Healthcare Corporation and ENH

KIRKLAND & ELLIS LLP

Jeff Dahnke,  
Charles B. Klein  
January 31, 2005  
Page 2

Files may still be introduced into evidence in the trial, BCBSI will also move for leave to file a renewed motion for *in camera* treatment of the Data Files after February 2, 2005 in the event that



KIRKLAND & ELLIS LLP

Jeff Dahnke,  
Charles B. Klein  
January 31, 2005  
Page 2

Files may still be introduced into evidence in the trial, BCBSI will also move for leave to file a renewed motion for *in camera* treatment of the Data Files after February 2, 2005 in the event that the Commission or Respondents seek to introduce any of the data contained therein into evidence

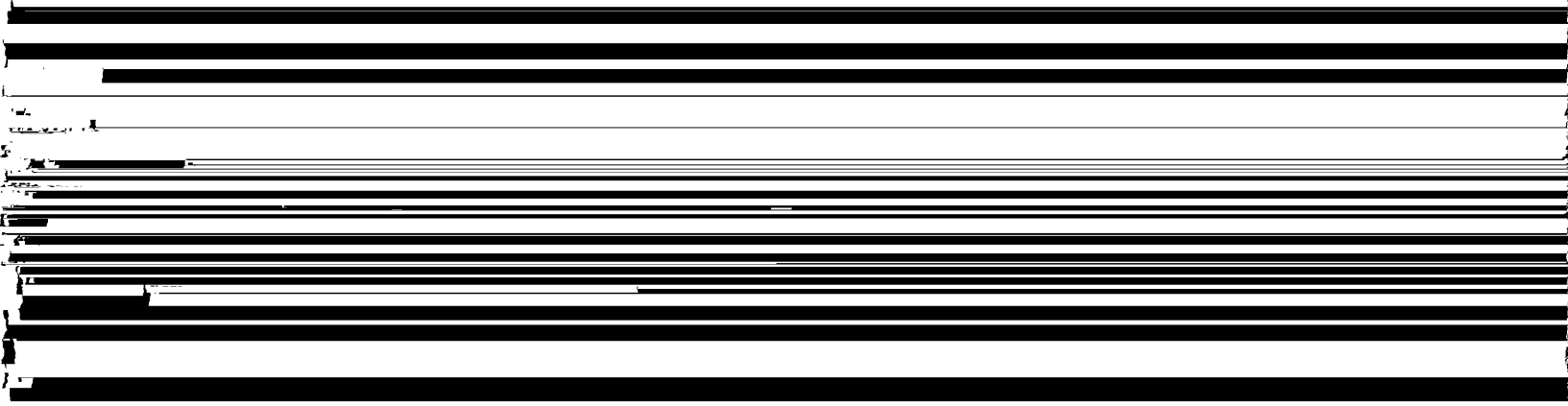
**UNITED STATES OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION**

_____	)	
In the Matter of	)	
	)	
Evanston Northwestern Healthcare	)	Docket No. 9315
Corporation, and	)	
	)	
ENH Medical Group, Inc.	)	
_____	)	

**ORDER**

Upon consideration of Third-Party Blue Cross Blue Shield of Illinois' ("BCBSI") Motion For Leave to File a Renewed Motion for *In Camera* Treatment, If Necessary, After February 2,

2005 FEBRUARY ORDER



**CERTIFICATE OF SERVICE**

I hereby certify that on February 2, 2005, a copy of the foregoing Third-Party Blue Cross

Necessary After February 2, 2005 was served via email and by first class mail, postage prepaid,  
on:

The Honorable Stephen J. McGuire

Duane M. Kelly, Esq.