

UNITED STATES OF AMERICA  
BEFORE FEDERAL TRADE COMMISSION

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

Docket No. 9315

HEALTHCARE CORPORATION, )  
a corporation, and )

ENH MEDICAL GROUP, INC., )  
a corporation. )  
\_\_\_\_\_)

**UNITED HEALTHCARE OF ILLINOIS, INC.'S SECOND SUPPLEMENTAL**

**MOTION FOR *IN CAMERA* TREATMENT OF CONFIDENTIAL AND  
COMPETITIVELY SENSITIVE INFORMATION**

sworn to on February 9, 2005, attached hereto as Ex. 1.

**Additional Exhibits Designated by the FTC**

On February 4, 2005, external legal counsel for United received a letter from the FTC dated February 3, 2005 advising of the FTC's intention to designate three

All of these documents have been designated as “Restricted Confidential, Attorney Eyes’ Only” pursuant to, or within the meaning of, the Protective Order in this action entered on March 24, 2004. See Second Supp. Foucré Decl.

**Additional Document Attachments to Documents Previously Designated by Respondents**

On January 21, 2005, external legal counsel for United received a facsimile from the Respondents’ counsel. See Second Avery Aff. A copy of the letter is attached as Exhibit B to the Second Avery Aff. This facsimile set forth several documents for which authentication was requested.

Respondents also asked for a “final version,” a “better copy,” and a “missing attachment” of certain documents, and has produced those but requests this Court to grant in camera treatment of the documents as follows:

1. Respondents’ Counsel sought a “final version” of a document designated by the Respondents as RX 1321. This document in its originally produced form was granted in camera treatment previously by this tribunal. See Order on Non-Parties’ Motions

Motions for In Camera Treatment pp.13-4. Accordingly, United seeks *in camera* treatment of the “better copy” of the same document. United has produced the “better copy” of this document with the designation “Restricted Confidential, Attorney Eyes Only” pursuant to the Protective Order in this action entered on March 24, 2004. A

copy of this “better copy” of the document designated by Respondents as RX 1321 is

to peg their prices to the prices of their competitors, with the effect of reducing provider price competition. Thus, disclosure would be highly detrimental to United's business

~~disclosure of this information would result in the loss of a business advantage~~

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Counsel for Non-Party United HealthCare of

Illinois, Inc.



**CERTIFICATE OF ELECTRONIC SUBMISSION**

I, Anant Raut, hereby certify on February 22, 2005, that this electronic version of the public version of United HealthCare of Illinois, Inc.'s Second Supplemental Motion for *In Camera* Treatment of Confidential and Competitively Sensitive Information, is a true and correct copy of the paper original, and that a paper copy with an original signature is being filed with the Secretary of the Commission on the same day by other means.

\_\_\_\_\_/s/\_\_\_\_\_  
Anant Raut