

UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION  
Office of Administrative Law Judges

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In the Matter of )  
)  
)  
Everston Northwestern Healthcare )

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Corporation, )  
a corporation. )  
)  
)  
\_\_\_\_\_ )

Docket No. 9315

**COMPLAINT COUNSEL'S REVISED WITNESS LIST**

At the request of the Court, Complaint Counsel submits this revised witness list.

This list contains Complaint Counsel's current best assessment of the witnesses that will be called at trial. Changes may be necessary, however, depending on the witnesses named by Respondent and further assessment of the issues. Further, Complaint Counsel anticipates

continued discussions with counsel for Respondents that may further reduce the number of

**THIRD PARTY WITNESSES**

1. Jane Ballengee, Regional Director of Network Development, Private Health Care

operations of PHCS; contracting for general acute care inpatient hospital services; hospital, physician and health plan competition in Northern Cook and Lake Counties; communications and negotiations between Evanston Northwestern and ENH Medical Group and PHCS; Evanston Northwestern's threats to terminate or to link hospital and physician contracts; hospital and physician compensation in the contracts that Evanston Northwestern or ENH Medical Group negotiated or sought to negotiate; matters addressed in her investigational hearing, deposition and other related topics; and contextual and other information related to Evanston Northwestern or documents that may appear on Complaint Counsel's exhibit list.

Medical Group and United Healthcare; Evanston Northwestern's threats to terminate hospital and physician contracts; hospital and physician compensation in the contracts that Evanston Northwestern or ENH Medical Group negotiated or sought to negotiate; matters addressed in her

9. Patrick Neary, Director of Contracting, Great West Healthcare of Illinois/One Health .  
Mr. Dorsey is anticipated to testify about, without limitation, the operations of One Health,

competition in Northern Cook and Lake Counties; communications and negotiations between  
Evanston Northwestern and FNH Medical Group and One Health; Evanston Northwestern's

and ENH Medical Group and various payors; Evanston Northwestern's linkage of hospital and physician contracts in negotiation with payors; Evanston Northwestern's explicit or implied

threats to terminate any payor's contract with Evanston Northwestern's hospitals or ENH Medical Group; hospital and physician compensation under such contracts; the size and magnitude of revenue enhancements from hospital and physician price increases; matters addressed in his investigational hearing, deposition, and other related matters; and contextual and other information related to Evanston Northwestern or documents that may appear on Complaint Counsel's exhibit list.

13. Jeffrey Hillebrand, COO, Evanston Northwestern Healthcare - Mr. Hillebrand is

and post-merger at Evanston and Highland Park and any changes thereto; and matters addressed in her deposition and other related topics; and contextual and other information related to

17. Homer Livingston, Chairman of the Board of Evanston Northwestern Healthcare -- Mr. Livingston is anticipated to testify about, without limitation, the general background, precursor events, negotiations and rationale for the merger with Highland Park Hospital; the pre and post-merger strategies, plans and finances of Evanston Northwestern; alternatives to the merger, including but not limited to, actual and potential joint ventures; discussions by Evanston and

testify about, without limitation, the quality of services pre and post-merger at Evanston and Highland Park and any changes thereto: matters addressed in her deposition and other

documents that may appear on Complaint Counsel's exhibit list.

21. Ronald Spaeth, former President and CEO of Highland Park Hospital - Mr. Spaeth is anticipated to testify about, without limitation, the operations of Lakeland and Highland Park prior to the merger with Evanston Northwestern; the general background, precursor events, negotiations and rationale for the merger with Evanston Northwestern; the pre-merger strategies,

17. [REDACTED] D.D. Dr. Plisack's anticipated testimony is described in his expert report.

[REDACTED]

[REDACTED]

[REDACTED]

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Respectfully submitted,

Dated: \_\_\_\_\_  
Thomas H. Brock, Esq.

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Dated: January 27, 2005

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing documents were served on counsel for the

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