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	ens identical to CV 204 and DV 601 manufactivals, which symmathands amounted in account
	protection in the February 9 order.
	2. Respondent requests that a Marketing Analysis Report (RX 2021)
	[REDACTED].
	3. Respondent requests that the following documents be given in
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detailing certain trial exhibits previously granted in camera treatment but determined by ENH during trial not to warrant such treatment.

Dated: Mars 20 2005

Respectfully Submitted

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Fax: (202) 282-5100

CERTIFICATE OF SERVICE

Marr 20 2005

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Respondents' Second Supplemental Motion for In Camera Treatment of Certain Exhibits was served (unless otherwise indicated) by email and first class mail, postage prepaid, on:

The Honorable Stephen J. McGuire Chief Administrative Law Judge
Federal Trade Commission
600 Pennsylvania Ave. NW (H-106)
Washington, DC 20580
(two courtesy copies delivered by messenger only)

Federal Trade Commission 600 Pennsylvania, Ave. NW (H-374) Washington, DC 20580 tbrock@ftc.gov

Philip M. Eisenstat, Esq. Federal Trade Commission 601 New Jersey Avenue, N.W. Room NJ-5235 Washington, DC 20580 peisenstat@ftc.gov

Chul Pak, Esq.
Assistant Director Mergers IV

UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION

In the matter of)	
Evanston Northwestern Healthcare)	Public Version
Corporation,)	Docket No. 9315
a corporation, and)	
ENH Medical Group, Inc.,)	
a corporation.)	
)	

MEMORANDUM IN SUPPORT OF RESPONDENT'S SECOND SUPPLEMENTAL MOTION FOR

IN CAMERA TREATMENT OF CERTAIN EXHIBITS

Pursuant to Rule 3.45(b) of the Federal Trade Commission Rules of Practice, 16 C.F.R. § 3.45(b), Respondent Evanston Northwestern Healthcare, Inc. ("ENH") submits this supplemental memorandum in support of its second supplemental motion for an order directing *in camera* treatment of certain documents containing highly confidential information produced in this proceeding. This memorandum incorporates by reference ENH's original Memorandum of Law in Support of its Motion For *In Camera* Treatment of Certain Exhibits ("Memorandum of Law") filed on January 4, 2005, and ENH's Supplemental Memorandum filed on February 3, 2005.

INTRODUCTION

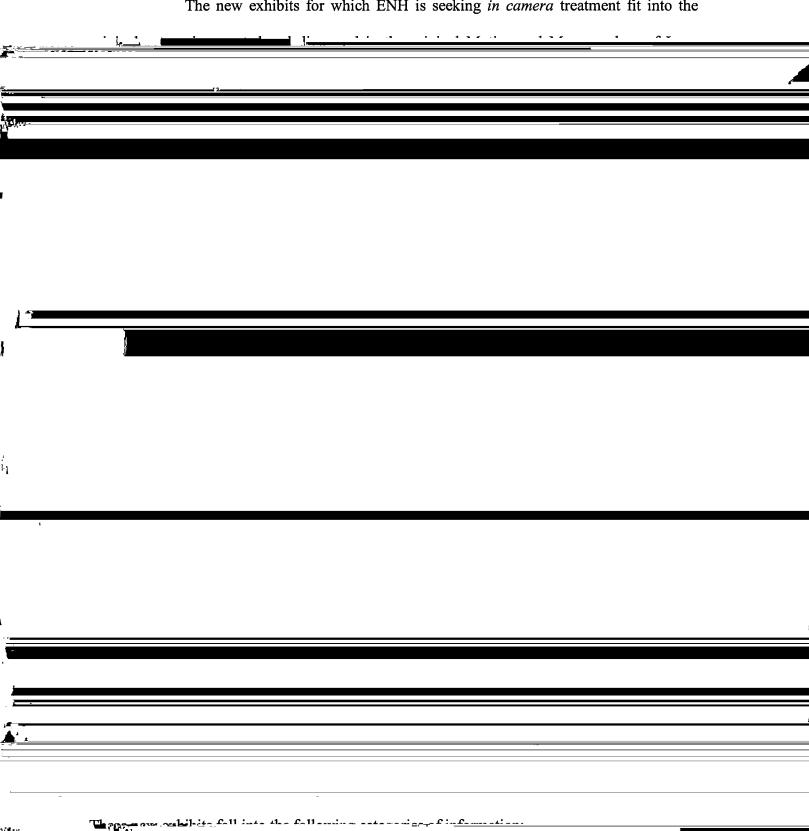
On February 9, 2005, the Court issued an Order granting ENH's motion for *in* camera treatment of certain exhibits that were described in Revised Supplemental Exhibits A and B. The Order noted that a review of the declarations "in support of the motion and the

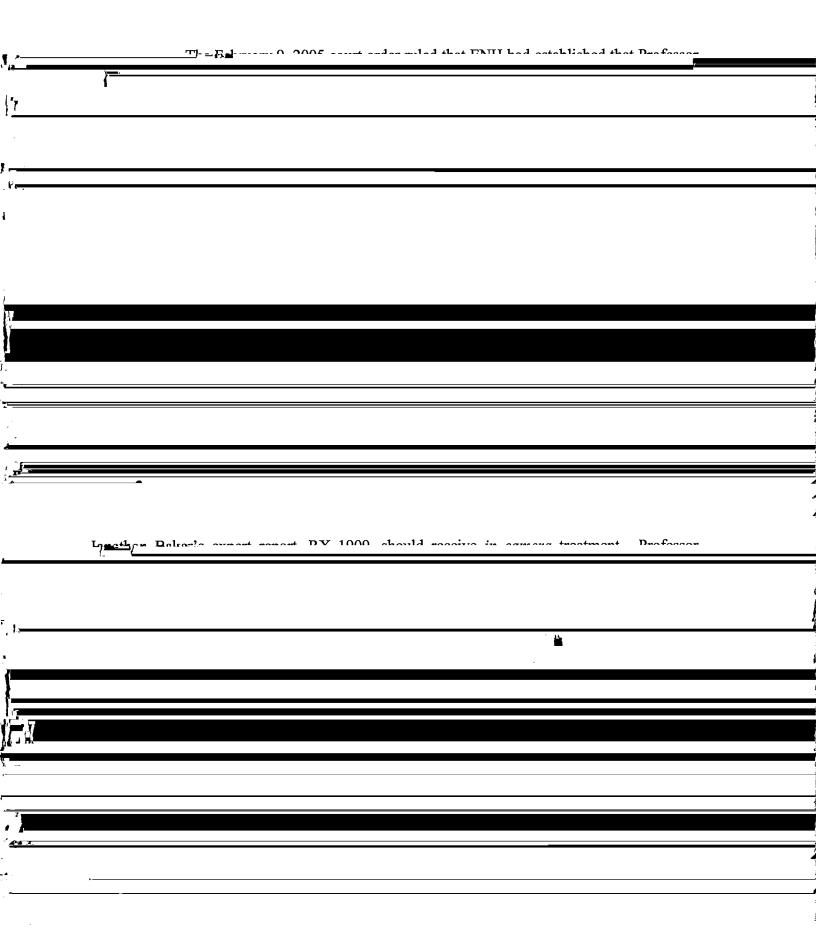
documents reveals that the information sought to be protected meets the standards for in During trial, Respondent and Complaint Counsel moved to admit trial exhibits that were not part of the "A" Trial Exhibit Lists admitted into evidence. The documents at ipassa proper ambibita aslacted form toist arbibit linta namenal sconformed to so the 4700 lints

ENH determined at trial that the documents described in Exhibit D do not meet this standard. Accordingly, those documents should not be afforded in camera treatment.

Information Categories Needing In Camera Protection Have Not Changed I.

The new exhibits for which ENH is seeking in camera treatment fit into the





Baker's report, [REDACTED]

Three exhibits in Exhibit C that fall into the "prices and rate negotiations"

considerations demand that employee performance and peer review information receive the protection of *in camera* treatment.

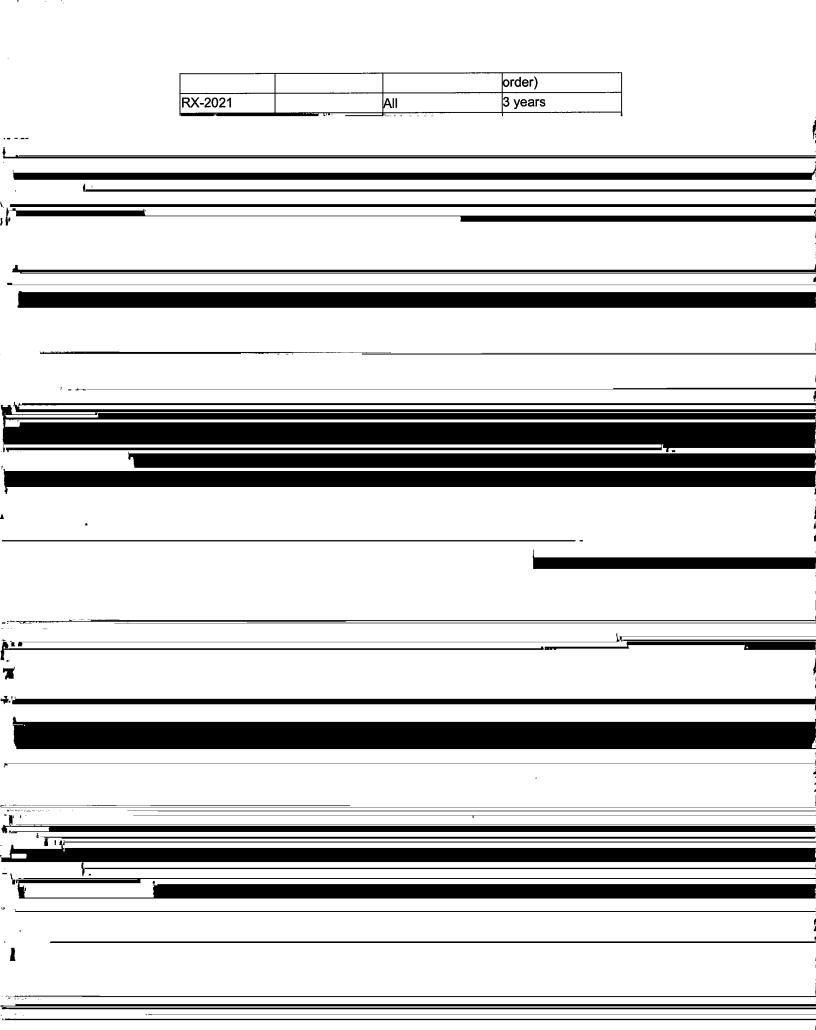
[REDACTED] Respondent moves the court to modify its February 9, 2005, order to enlarge the ten year *in camera* sealing period for RX 1771 and CX 2312 to permanently seal these two exhibits.

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CONCLUSION

For the foregoing reasons, ENH requests that the Court grant in camera

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CERTIFICATE OF SERVICE

I hereby certify that on May 20, 2005, public copies of the foregoing Memorandum in Support of Respondent's Second Supplemental Motion for *In Camera* Treatment of Certain Exhibits and a proposed order were served (unless otherwise indicated) by email and first class mail, postage prepaid, on:

The Honorable Stephen J. McGuire 600 Pennsylvania Ave. NW (H-106) Washington, DC 20580 (two courtesy copies delivered by messenger only) Thomas H. Brock, Esq.





