~ 0 9349

PUll LI C

NON·PARTYt:NITEI>HEALTH GROUPINCORPORATRJ)S MOTION FOR IN CAMERA TREATVIE:'IT OF 1'1WPOSEDEVIDENCE

UnHedHcalth (Jroup incorporated("United"). which is not a party

	United's 2006-2007 interna	information (allowed reimbursement
ges) for Swedish		American Hospita
er audit reports for Hospital and Swedish ital.	FTC_OSF-United-01157	United's chargema Rockford Memori
	FTC_OSF-United-01255	American Ho

55: 7-57:9; 63:4-67:4; 67:14-69:7; 7 2; 95:22-97:15; 97:25-99:1; 99:20-100:15

Chart C – Contracts

SF-Unit

[redacted]

PUB

in Question.

United has taken

providers in which United negotiates contracts with (e.g., Memorial, OSF, Swedis

documents and testimony

Declarati of Michelle M. Lobe in Support of Non-Party UnitedHealthGroup Inc notion for

explained below, disclosure of this information would cause se

employer groups) and contracted healthcare provi

cing and financial information and how United

commercially sensitive information regarding pr

. These documents reveal sensitive information regarding the manner in which

their own advantage in targeting United's contracted healthcare providers and analyzing the

by healthcare providers to gain an advantage during contract negotiations with United and other

payors for that matter and potentially drive up reimbursement amounts. Id. Disclosure of this

[redacted]

s expended numerous hours and many years to develop. [redacted] that United ha

[redacted]

[redacted]

[redacted]

old sales statistics of non-parties). *In camera* treatment of information encourages non-parties to cooperate with future discovery requests in adjudicative proceedings. *Id.* United has cooperated with the discovery demands in this matter; however, this case has produced over 50,000 pages of documents and [redacted]

[redacted] Conversely, [redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]UBLIC VERSIO[redacted]

II. CONCLUSION

[redacted]eatment for a [redacted]e

od of 5 years and that the docume[redacted]ier[redacted]ied in Charts B and C be afforded

indefinite t

camera treatment.[4]

Dated: Ma

h 20, 201[redacted]UNITEDHEALTH GROUP INCORPORATED[redacted]

[redacted]

[redacted]/ax
jgardner@ngelaw.com
tpapadopoulos@ngelaw.com

[4] Attached hereto as Exhibit [redacted]

PUBLIC VERSION

UNITED STATES OF

PUBLIC VERSION

UNITED STATES OF AMERICA

BEFORE THE

I certify that the electronic copy sent to the Secretary of the

correct copy of the paper original and that I possess a paper origin

Hon. D. Michael Campbe

ustrative Law Judge

COMMISSION

600 Pennsylvania Ave., NW, Rm. 11-110

Washington, D

gmorrison@ftc.gov

McDERMOTT W ERY

600 13th St., N.W.

Washington, DC 005-3096

HAW & CUTLERTSON LLP

222 N. LaSalle St., Suit

Chicago, IL 60601

UNITED STATES OF AMERICA

BEFORE THE FEDERAL [redacted]

Attachment A

In the Matter of OSF Healthcare Syste

ied	PX0217			Michelle Mary Looe (DHC) Desig
	PX0001			

Papadopoulos, Athanasios T

UNITED STATES OF AMERICA

BEFORE

IN CAMERA TREATMENT OF PROPOSED

EXHIBIT B

McDermott

Carla A. R. Hine
Associate
chine@mwe.com
+1 202 756 8095

March 13, 2012

VIA E-MAIL *JGARDNER*

[redacted]

[redacted]

[redacted]

6732

ETC OSE	ETC OSE			
United-	United-			
17909	17917			
Ltd Gina Schlink	United-	UNITED-		re: SwedishAme
Grov	posal	18032	18035	Respons
OSE	ETC OSE	9/21/2010		

il from Joanne Beck to T

Beg Bates	End Bates	Date	Description / Title
[redacted]	000038	09/30/07	[redacted]

[redacted]

58:13-19; 60:2-6

Beg Dates	End Dates	Date	Description / Title

UNITED STATES OF AMERICA

[redacted]

Docket No. 9349

a corporation, et al.

D'S MOTION FOR
POSED EVIDENCE

NON-PARTY UNITEDHEALTH GROUP INCORPORATE
IN CAMERA TREATMENT [redacted] PRO

EXHIBIT C

EX

The information contained in these documents is compiled by UnitedHealthcare and is not

[redacted]

EXHIBIT A TO DECLARATION OF MICHELLE M. LOBE

Chart A – Membership, Product and Proprietary Information

FTC-OSF-United-005160-01142	United enrollment, premiums and claims paid for members in Boone, OK

Chart B – United's Pricing and Financial Information

FTC-OSF-United-01153	United's 2007-2009 internal pricing information (allowed reimbursement as a percentage of gross charges) for Rockford Memorial Hospital

[redacted]

[redacted]	FTC-OSF-United-01155

[redacted]

[redacted]	[redacted]

[redacted]

[redacted]	[redacted]

FTC-UHC-000015-000026	UnitedHealthcare All Payer Appendix
	10/01/06-9/30/07
FTC-UHC-000039-000058	Facil[redacted] Participation Agreement between UnitedHealthcare Insurance Compa[redacted]
	Hospital [redacted]
	[redacted]

UNITED STATES OF AMERICA

BEFORE

IC) PUB

Rockford Health System)

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

In the Matter of)
)
OSF Healthcare System,) Docket No. 9349
a corporation, and) PUBLIC
)
Rockford Health System,)
a corporation.)
)

PROPOSED ORDER

On March 20

information for Boone, Ogle and Winnebago

IT IS FURTHER ORDERED that the following documents will be sul

percentage of gross charges) for

FTC_OSF-United-01154

FTC_OSF-United-01255

United's internal Network Pricing Calculator

:23-31:16; 32:12-36:8; 40:16-41:24; 50
55:11; 55:17-57:9; 63:4-67:4; 67:14-69:7;
78:1-79:12; 95:22-97:1

FTC_OSF-United-03945-03953	All Payer Appendix for Swedish American Hospital
FTC_OSF-United-03954-03962	Options PPO Payer Appendix for Swedish American Hospital.
FTC_OSF-United-03963-03966	Medicare Select Appendix for Swedish American Hospital.
FTC_OSF-United-15674-15677	E-Mail string, dated August 24, 2009, [illegible] between United and Swedish American

UnitedHealthcare Insurance Company and Rockford Memorial Hospital, dated October 1, 2004.

27, 2011, p. 2 [illegible]:10-13: 35:6-15; 40:20-41:8; 42:9-44:18; 48:25-49:9; 56:23-57:12; 58:8-15; 60:8-61:20; 62:5:65:14; [illegible]

M. Lobe Transcript, January 10, 2012 18:19-

150:18-151:16; 163:10-16; 164:14-16; 164:13-17; 164:24-165:10; 165:25-166:1; 173:21-174:8; 175:1-19; 179:1-6; 18[illegible]5-187:2; 188:10-189:2;

M. Lobe Transcript, February 24, 201[illegible]14:5[illegible]

7; 19:15; 22:3; 36:9-37:6; 41:25-42:9; 43:16

¶18, 20-26

S FURTH[illegible]

DATED: