

[REDACTED]

June 3, 1988

JUN 6 10 11 AM '88

Wayne Kaplan, Esq.
Premerger Notification Office
Bureau of Competition
Room 303
Federal Trade Commission

may be subject to

Dear Mr. Kaplan:

System of Information

We have been retained as counsel to a not-for-profit
[REDACTED]

7(a) of the Clayton Act (15 U.S.C. § 18(A)). System is part of
a reorganized health care system which is comprised of a
not-for-profit parent ("Parent") and several affiliates, one of
which is the entity making the acquisition. Parent exercises

illustrates graphically the applicable corporate structure.

Based on our telephone conversation, you indicated that
under the facts and circumstances presented, the Parent is
considered the ultimate Parent for purposes of the Notification
and Report Form and there is no need to go up to the next tier
which is sponsorship by the religious order. If we do not
receive any notice from your office to the contrary within ten
(10) days from the date of this letter, we will assume that
this position is accurate.

Wayne Kaplan, Esq.
June 3, 1988
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If you have any questions in regard to the above, please
[redacted] me.

Very truly
[redacted]

[redacted]

OK. in. 6/16/88
WCV