April 30, 2014

Mr. Jeffrey W. Brennan, Esq.
McDermott Will & Emery
500 North Capitol Street, N.W.
Washington, DC 20001

Re: Proposed Merger of Rochester General Health System and Unity Health System
FTC File No. 131-0129

Dear Mr. Brennan:

The Federal Trade Commission’s Bureau of Competition has been conducting a
nonpublic investigation to determine whether the proposed merger of Rochester General Health System and Unity Health System may violate Section 7 of the Clayton Act or Section 5 of the Federal Trade Commission Act.

Upon further review of this matter, it now appears that no further action is warranted by
the Commission at this time. Accordingly, the investigation has been closed. This action is not to be construed as a determination that a violation may not have occurred, just as the pendency of an investigation should not be construed as a determination that a violation has occurred. The Commission reserves the right to take such further action as the public interest may require.

By direction of the Commission