

UNITED STATES OF AMERICA
BEFORE FEDERAL TRADE COMMISSION

FEDERAL TRADE COMMISSION
04 APR -9 PM 3: 22
DOCUMENT PROCESSING

In the Matter of
NORTH TEXAS SPECIALITY PHYSICIANS,

a corporation.

Docket No. 9312

**COMPLAINT COUNSEL'S RESPONSE IN SUPPORT OF NONPARTY HEALTH
PLANS' JOINT EXPEDITED MOTION TO EXTEND TIME FOR IN CAMERA
DOCUMENT DESIGNATION AND TO ENFORCE ORDER TO NARROW
RESPONDENT'S EXHIBIT LIST**

Complaint Counsel supports the health plans' joint motion to extend time for in camera document designation and to enforce the Court's Order to narrow Respondent's exhibit list. Complaint Counsel will not be harmed or burdened if Your Honor extends the time for Third Parties to designate documents for in camera treatment. Based on the number of documents on Respondent's exhibit list, we believe that an extension of time would be appropriate. Complaint Counsel also believes that Respondent did not undertake a good faith effort to reduce the number of documents on its exhibit list. Respondent appears to have removed some of the duplicates from its list rather than making a good faith effort to remove original documents from it. Consequently, we believe that Respondent should be required to adhere to this Court's Order by making a true good faith effort to remove documents from its over-inclusive exhibit list.

Respectfully submitted,



Michael J. Bloom
Matthew J. Reilly

signed for by
X EJ Bul

Attorneys for Complaint Counsel
Federal Trade Commission
Northeast Region
One Bowling Green, Suite 318
New York, NY 10004
(212) 607-2829
(212) 607-2822 (facsimile)

Dated: April 9, 2004

CERTIFICATE OF SERVICE

I, Eli M. Barach, hereby certify that on April 9, 2004, I caused a copy of Complaint

Counsel's Response in Support to be served upon the following persons:

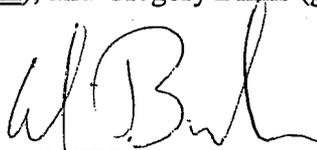
Office of the Secretary
Federal Trade Commission
Room H-159
600 Pennsylvania Avenue, NW
Washington, D.C. 20580

Hon. D. Michael Chappell
Administrative Law Judge
Federal Trade Commission
Room H-104
600 Pennsylvania Avenue, NW
Washington, D.C. 20580

Gregory S. C. Huffman, Esq.
Thompson & Knight, LLP
1700 Pacific Avenue, Suite 3300
Dallas, Texas 75201-4693

and by email upon the following: Gregory S. C. Huffman (gregory.huffman@tklaw.com),

William Katz (William.Katz@tklaw.com), and Gregory Binns (gregory.binns@tklaw.com).



Eli M. Barach