

[PUBLIC]

UNITED STATES OF AMERICA
BEFORE FEDERAL TRADE COMMISSION

IN THE MATTER OF

NORTH TEXAS SPECIALTY PHYSICIANS,
A CORPORATION.

Docket No. 9312

**NORTH TEXAS SPECIALTY PHYSICIANS' MOTION FOR LEAVE TO FILE CORRECTED
DECLARATION OF ROBERT S. MANNES SUPPORTING RESPONSE TO COMPLAINT COUNSEL'S
MOTIONS *IN LIMINE***

Respondent North Texas Specialty Physicians ("NTSP") requests leave to file the Corrected Declaration of Robert S. Manness Supporting Response to Complaint Counsel's Motions *in Limine* , attached to this motion as Exhibit C, on April 19, 2004. Two attachments to the declaration of Dr. Robert S. Maness, a total of only three pages, and referenced in that declaration attached as Exhibit I to Respondent's Consolidated Response to Complaint Counsel's Motions *in Limine* filed on April 2, 2004, were inadvertently left out of the previous filing.

We request that the Court accept this corrected declaration. The previous declaration of Dr. Maness served on Complaint Counsel was identical and the attachments were complete except for these three pages that were inadvertently not attached. The contents of these three pages were detailed in the declaration of Dr. Maness that Complaint Counsel already received on April 2, 2004.

Respectfully submitted,

Gregory S. C. Huffman
William M. Katz, Jr.
Gregory D. Binns

THOMPSON & KNIGHT LLP
1700 Pacific Avenue, Suite 3300
Dallas TX 75201-4693
214.969.1700
214.969.1751 - Fax
gregory.huffman@tklaw.com
william.katz@tklaw.com
gregory.binns@tklaw.com

**ATTORNEYS FOR NORTH TEXAS
SPECIALTY PHYSICIANS**

CERTIFICATE OF SERVICE

I, Gregory D. Binns, hereby certify that on April 17, 2004, I caused a copy of the foregoing to be served upon the following persons:

Michael Bloom (via Federal Express and e-mail)
Senior Counsel
Federal Trade Commission
Northeast Region
One Bowling Green, Suite 318
New York, NY 10004

Barbara Anthony (via certified mail)
Director
Federal Trade Commission
Northeast Region
One Bowling Green, Suite 318
New York, NY 10004

Hon. D. Michael Chappell (2 copies via Federal Express)
Administrative Law Judge
Federal Trade Commission
Room H-104
600 Pennsylvania Avenue NW
Washington, D.C. 20580

Office of the Secretary (via Federal Express)
Donald S. Clark
Federal Trade Commission
Room H-159
600 Pennsylvania Avenue NW
Washington, D.C. 20580

and by e-mail upon the following: Susan Raitt (sraitt@ftc.gov) and Jonathan Platt (jplatt@ftc.gov).

Gregory D. Binns

EXHIBIT A

EXHIBIT B

**Exhibit C is subject to the Protective Order Governing Discovery
Material**

**Persons to be notified of Commission's intent to disclose in a final decision any of the
confidential information contained in this document:**

Counsel for Respondent
Gregory S. C. Huffman
Thompson & Knight L.L.P.
1700 Pacific Ave.
Suite 3300
Dallas, TX 75201
214.969.1700
214.969.1751 (facsimile)

EXHIBIT C
has been redacted from the public
version.

UNITED STATES OF AMERICA
BEFORE FEDERAL TRADE COMMISSION

IN THE MATTER OF

NORTH TEXAS SPECIALTY PHYSICIANS,
A CORPORATION.

Docket No. 9312

**Proposed Order Granting Respondent North Texas Specialty Physicians'
Motion for Leave to File Corrected Declaration of Robert S. Manness Supporting Response
to Complaint Counsel's Motions *in Limine***

Respondent North Texas Specialty Physicians filed a Motion for Leave to File Corrected Declaration of Robert S. Manness Supporting Response to Complaint Counsel's Motions *in Limine* on April 19, 2004. Only three pages of attachments were inadvertently left out of the declaration originally filed as Exhibit I to Respondent's Consolidated Response to Complaint Counsel's Motions in *Limine* on April 2, 2004. The addition of these attachments will in no way prejudice Complaint Counsel because Complaint Counsel was previously served with the complete declaration detailing the contents of these three pages. For these reasons, Respondent's motion is GRANTED.

Ordered:

D. Michael Chappell
Administrative Law Judge

Date: