

**UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION**

In the Matter of	)	
	)	
	)	Docket No. 9315
	)	<b>(Public Record Version)</b>
<b>Evanston Northwestern Healthcare Corporation,</b>	)	
a corporation, and	)	
	)	
<b>ENH Medical Group, Inc.,</b>	)	
a corporation.	)	

**COMPLAINT COUNSEL’S SIXTH REQUEST FOR ADMISSIONS  
CONCERNING AUTHENTICITY AND ADMISSIBILITY**

Pursuant to the Federal Trade Commission (“FTC”) Rules of Practice for Adjudicative Proceedings § 3.32, complaint counsel submit these requests for admissions to respondents Evanston Northwestern Healthcare Corporation and ENH Medical Group, Inc.

**Definitions**

1. “Evanston Northwestern Healthcare” means Evanston Northwestern Healthcare Corporation, including its past or surviving parents, subsidiaries and affiliates (including Evanston Hospital Corporation, Evanston Hospital, Glenbrook Hospital, and, beginning on January 1, 2000, Highland Park Hospital), a corporation organized, existing, and doing business under and by virtue of the

laws of the State of Illinois, with its principal place of business located at 1301 Central Street, Evanston, Illinois 60201.

2. “Highland Park” means Highland Park Hospital, including its past or surviving parents, subsidiaries and affiliates, a hospital located near Evanston, Illinois.
3. “[REDACTED]” means [REDACTED], including its past or surviving parents, subsidiaries, and affiliates (including [REDACTED]).
4. “[REDACTED]” means [REDACTED], including its past or surviving parents, subsidiaries, and affiliates (including [REDACTED]).
5. “Business Record” as defined according to Rule 803(6) of the Federal Rules of Evidence is “[a] memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses, made at or near the time by, or from information transmitted by, a person with knowledge, if kept in the course of a regularly conducted business activity, [where] it was the regular practice of that business activity to make the memorandum, report, record or data compilation...”

### **REQUESTS FOR ADMISSIONS**

[REDACTED]

**Highland Park**

[REDACTED]

1592. The document attached to this Request for Admissions as Exhibit CX-05104 is authentic, genuine, and a true and correct copy of a contract between [REDACTED] and Highland Park, entered into on [REDACTED]. The [REDACTED] contract is a business record of one or both contracting parties. The contract is admissible into evidence in this matter.
1593. Exhibit CX-05104 constitutes an authentic, genuine, true and correct copy of the complete set of the [REDACTED] contracts and amendments between [REDACTED] and Highland Park from [REDACTED]. This set of an exhibit is admissible into evidence in this matter.

[REDACTED]

1594. The document attached to this Request for Admissions as Exhibit CX-05105 is authentic, genuine, and a true and correct copy of a contract between [REDACTED] and Highland Park, effective [REDACTED]. The [REDACTED] contract is a business record of one or both contracting parties. The contract is admissible into evidence in this matter.
1595. The document attached to this Request for Admissions as Exhibit CX-05106 is authentic, genuine, and a true and correct copy of an amendment, extending the contract term to [REDACTED], to CX-05105. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.

1596. The document attached to this Request for Admissions as Exhibit CX-05107 is authentic, genuine, and a true and correct copy of an amendment, extending the contract term to [REDACTED], to CX-05105. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1597. The document attached to this Request for Admissions as Exhibit CX-05108 is authentic, genuine, and a true and correct copy of an amendment, concerning the contract term beginning [REDACTED], to CX-05105. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1598. The document attached to this Request for Admissions as Exhibit CX-05109 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05105. The [REDACTED] amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1599. The document attached to this Request for Admissions as Exhibit CX-05110 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05105. The [REDACTED] amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1600. The document attached to this Request for Admissions as Exhibit CX-05111 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05105. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.

1601. Exhibits CX-05105 through CX-05111 constitute an authentic, genuine, true and correct copy of the complete set of the [REDACTED] contracts and amendments between [REDACTED] and Highland Park from [REDACTED]. This set of exhibits is admissible into evidence in this matter.
1602. The document attached to this Request for Admissions as Exhibit CX-05112 is authentic, genuine, and a true and correct copy of a consent to assignment (plus a cover letter and other related documents), effective [REDACTED]. The consent to assignment is a business record of one or both parties to the consent to assignment. The consent to assignment is admissible into evidence in this matter.
1603. Exhibit CX-05112 constitutes an authentic, genuine, true and correct copy of the complete set of the consents to assignment (plus a cover letter and other related documents) between [REDACTED] and Highland Park from [REDACTED]. This set of an exhibit is admissible into evidence in this matter.

**Evanston Northwestern Healthcare**

[REDACTED]

1604. The document attached to this Request for Admissions as Exhibit CX-05113 is authentic, genuine, and a true and correct copy of a contract (plus a cover letter) between [REDACTED] and Evanston Northwestern Healthcare, entered into [REDACTED]. The [REDACTED] contract is a business record of one or both contracting parties. The contract is admissible into evidence in this matter.
1605. The document attached to this Request for Admissions as Exhibit CX-05114 is authentic, genuine, and a true and correct copy of an amendment (plus a cover letter), effective

- [REDACTED], to CX-05113. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1606. The document attached to this Request for Admissions as Exhibit CX-05115 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05113. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1607. The document attached to this Request for Admissions as Exhibit CX-05116 is authentic, genuine, and a true and correct copy of an amendment (plus a cover letter), effective [REDACTED], to CX-05113. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1608. The document attached to this Request for Admissions as Exhibit CX-05117 is authentic, genuine, and a true and correct copy of an amendment (plus a cover note and cover letter), signed on [REDACTED], to CX-05113. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1609. Exhibits CX-05113 through CX-05117 constitute an authentic, genuine, true and correct copy of the complete set of the [REDACTED] contracts and amendments (plus a cover note and four cover letters) between [REDACTED] and Evanston Northwestern Healthcare from [REDACTED]. This set of exhibits is admissible into evidence in this matter.
1610. The document attached to this Request for Admissions as Exhibit CX-05118 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED]. The

amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.

1611. Exhibit CX-05118 constitutes an authentic, genuine, true and correct copy of the complete set of the [REDACTED] amendments between [REDACTED] and Evanston Northwestern Healthcare from [REDACTED]. This set of an exhibit is admissible into evidence in this matter.

[REDACTED]

1612. The document attached to this Request for Admissions as Exhibit CX-05119 is authentic, genuine, and a true and correct copy of a [REDACTED] amendment (plus two letters), signed [REDACTED]. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.

1613. The document attached to this Request for Admissions as Exhibit CX-05120 is authentic, genuine, and a true and correct copy of an amendment (plus a cover letter), effective [REDACTED]. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.

1614. The document attached to this Request for Admissions as Exhibit CX-05121 is authentic, genuine, and a true and correct copy of an amendment, entered into [REDACTED]. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.

1615. The document attached to this Request for Admissions as Exhibit CX-05122 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED]. The amendment is a business record of one or both parties to the amendment. The

amendment is admissible into evidence in this matter.

1616. Exhibits CX-05119 through CX-05122 constitute an authentic, genuine, true and correct copy of the complete set of the [REDACTED] contracts and amendments (plus three letters) between [REDACTED] and Evanston Northwestern Healthcare from [REDACTED]. This set of exhibits is admissible into evidence in this matter.
1617. The document attached to this Request for Admissions as Exhibit CX-05118 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED]. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1618. Exhibit CX-05118 constitutes an authentic, genuine, true and correct copy of the complete set of the [REDACTED] amendments between [REDACTED] and Evanston Northwestern Healthcare from [REDACTED]. This set of an exhibit is admissible into evidence in this matter.

[REDACTED]

**Highland Park**

1619. The document attached to this Request for Admissions as Exhibit CX-05123 is authentic, genuine, and a true and correct copy of a contract (plus a rate quote sheet) between [REDACTED] and Highland Park, effective [REDACTED]. The [REDACTED] contract is a business record of one or both contracting parties. The contract is admissible into evidence in this matter.
1620. The document attached to this Request for Admissions as Exhibit CX-05124 is authentic, genuine, and a true and correct copy of a contract (plus a cover sheet) [REDACTED]



and Highland Park, effective [REDACTED]. The [REDACTED] contract is a business record of one or both contracting parties. The contract is admissible into evidence in this matter.

1621. Exhibits CX-05123 through CX-05124 constitute an authentic, genuine, true and correct copy of the complete set of the [REDACTED] contracts and amendments (plus a rate quote sheet and a cover sheet) between [REDACTED] and Highland Park from [REDACTED]. This set of exhibits is admissible into evidence in this matter.

1622. Exhibit CX-05124 constitutes an authentic, genuine, true and correct copy of the complete set of the [REDACTED] contracts and amendments (plus a cover sheet) between [REDACTED] and Highland Park from [REDACTED]. This set of an exhibit is admissible into evidence in this matter.

#### **Evanston Northwestern Healthcare**

1623. The document attached to this Request for Admissions as Exhibit CX-05125 is authentic, genuine, and a true and correct copy of a contract (plus a cover sheet) between [REDACTED] and Evanston Northwestern Healthcare, effective [REDACTED]. The [REDACTED] contract is a business record of one or both contracting parties. The contract is admissible into evidence in this matter.

1624. The document attached to this Request for Admissions as Exhibit CX-05126 is authentic, genuine, and a true and correct copy of a contract between [REDACTED] and Evanston Northwestern Healthcare, effective [REDACTED]. The [REDACTED] contract is a business record of one or both contracting parties. The contract is admissible into

evidence in this matter.

1625. Exhibits CX-05125 through CX-05126 constitute an authentic, genuine, true and correct copy of the complete set of the [REDACTED] contracts and amendments (plus a cover sheet) between [REDACTED] and Evanston Northwestern Healthcare from [REDACTED]. This set of exhibits is admissible into evidence in this matter.
1626. Exhibit CX-05126 constitutes an authentic, genuine, true and correct copy of the complete set of the [REDACTED] contracts and amendments between [REDACTED] and Evanston Northwestern Healthcare from [REDACTED]. This set of an exhibit is admissible into evidence in this matter.
1627. The document attached to this Request for Admissions as Exhibit CX-05127 is authentic, genuine, and a true and correct copy of a contract (plus a cover sheet) between [REDACTED] and Evanston Northwestern Healthcare [REDACTED], effective [REDACTED]. The [REDACTED] contract is a business record of one or both contracting parties. The contract is admissible into evidence in this matter.
1628. The document attached to this Request for Admissions as Exhibit CX-05128 is authentic, genuine, and a true and correct copy of a contract (plus a cover sheet) between [REDACTED] and Evanston Northwestern Healthcare [REDACTED], effective [REDACTED]. The [REDACTED] contract is a business record of one or both contracting parties. The contract is admissible into evidence in this matter.
1629. The document attached to this Request for Admissions as Exhibit CX-05129 is authentic, genuine, and a true and correct copy of a contract (plus a cover sheet) between [REDACTED] and Evanston Northwestern Healthcare [REDACTED], effective

[REDACTED]. The [REDACTED] contract is a business record of one or both contracting parties. The contract is admissible into evidence in this matter.

1630. Exhibits CX-05127 through CX-05129 constitute an authentic, genuine, true and correct copy of the complete set of the [REDACTED] contracts and amendments (plus three cover sheets) between [REDACTED] and Evanston Northwestern Healthcare from [REDACTED]. This set of exhibits is admissible into evidence in this matter.

#### Attachments

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Dated: \_\_\_\_\_, 2004

**CERTIFICATE OF SERVICE**

This is to certify that on \_\_\_\_\_, 2004, I caused a copy of the foregoing to be served upon counsel for the respondents by electronic mail and first class mail delivery:

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and delivery of two copies to:

The Honorable Stephen J. McGuire  
Federal Trade Commission  
600 Pennsylvania Avenue  
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Washington, D.C. 20580

\_\_\_\_\_  
Thomas Brock