

**UNITED STATES OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION  
OFFICE OF ADMINISTRATIVE LAW JUDGES**

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

**RESPONDENTS' REVISED WITNESS LIST**

Pursuant to the Second Revised Scheduling Order, Respondents Evanston Northwestern Healthcare Corporation (“ENH”) and ENH Medical Group, Inc. (“ENH Medical Group”) hereby designate those persons whom Respondents may call to testify at deposition or at trial.

**PERSONS AFFILIATED WITH RESPONDENTS**

1. ENH Current and Former Employees:
  - A. Mark Neaman – ENH’s Chief Executive Officer. Mr. Neaman may be called to testify about, without limitation, legacy ENH, legacy Highland Park Hospital (“HPH”), ENH Medical Group, the Northwestern Healthcare Network (“NHN”), the merger between ENH and HPH (“merger”), the accomplishments of the merger, the pertinent competitive landscape, the relationship between ENH and managed care organizations, the relationship between ENH and local employers, and the impact on the community of the remedy proposed by Complaint Counsel.
  - B. Jeffrey Hillebrand – ENH’s Chief Operating Officer. Mr. Hillebrand may be called to testify about, without limitation, legacy ENH, legacy HPH, the NHN, the merger, the accomplishments of the merger, the pertinent competitive landscape, the relationships between ENH and managed care organizations, the relationship between ENH and local employers, and the impact on the community of the remedy proposed by Complaint Counsel.
  - C. Dr. Joseph Golbus – ENH Medical Group’s President. Dr. Golbus may be called to testify about, without limitation, ENH Medical Group and issues pertaining to the legacy ENH, legacy HPH and the post-merger independent physician association.

- D. Ronald Spaeth – HPH’s former Chief Executive Officer. Mr. Spaeth may be called to testify about, without limitation, legacy HPH, the NHN, the merger, the accomplishments of the merger, and the impact on the community of the remedy proposed by Complaint Counsel.
- E. Thomas Hodges – ENH’s Chief Financial Officer. Mr. Hodges may be called to testify about, without limitation, post-merger ENH and financial issues pertaining to the merger.
- F. Mary O’Brien – HPH’s President. Ms. O’Brien may be called to testify about, without limitation, legacy ENH, legacy HPH, the NHN, the merger, post-merger HPH, the accomplishments of the merger, and the impact on the community of the remedy proposed by Complaint Counsel.
- G. Jack Gilbert – HPH’s former Chief Financial Officer. Mr. Gilbert may be called to testify about, without limitation, legacy HPH, the NHN, the merger, the accomplishments of the merger and the relationships between legacy HPH/post-merger ENH and managed care organizations.
- H. Peggy King – ENH’s Senior Vice President Quality Improvement. Ms. King may be called to testify about, without limitation, the quality of care at legacy ENH and legacy HPH and how the merger improved the quality of care at ENH and HPH.
- I. Jodi Levine – ENH Medical Group’s former Vice President. Ms. Levine may be called to testify about, without limitation, legacy ENH, the NHN, the merger, the accomplishments of the merger and the relationships between ENH and managed care organizations.
- J. Homer Livingston – ENH’s Chairman of the Board. Mr. Livingston may be called to testify about, without limitation, legacy ENH, the NHN, the merger, the accomplishments of the merger, the pertinent competitive landscape, the relationship between ENH and managed care organizations, the relationship between ENH and local employers, and the impact on the community of the remedy proposed by Complaint Counsel.
- K. Marsha Miller – ENH Medical Group’s Executive Vice President. Ms. Miller may be called to testify about, without limitation, ENH Medical Group and issues pertaining to the legacy ENH, legacy HPH and the post-merger independent physician association.
- L. Brian Washa – ENH’s Vice President of Business Services. Mr. Washa may be called to testify about, without limitation, relationships between ENH and managed care organizations.

- M. Jim Styer – Current Chairman of the Highland Park Healthcare Foundation. Mr. Styer may be called to testify, without limitation, the HPH Foundation, the effect of the merger on the Highland Park community, and the impact on the community of the remedy proposed by Complaint Counsel.
- N. Mayor Michael Belsky – Current Mayor of Highland Park and member of the Highland Park Healthcare Foundation. Mayor Belsky may be called to testify, without limitation, the HPH Foundation, the effect of the merger on the Highland Park community, and the impact on the community of the remedy proposed by Complaint Counsel.
- O. Michelle Mittleman – Former Manager of Network Development for ENH Medical Group. Ms. Mittleman may be called to testify about, without limitation, ENH Medical Group and issues pertaining to the legacy ENH, legacy HPH and the post-merger independent physician association.
- P. Dr. Todd K. Rosengart – ENH Division Head, Cardiothoracic Surgery. Dr. Rosengart may be called to testify about, without limitation, the cardiothoracic surgery program at ENH, the accomplishments of the merger, and the impact on the community of the remedy proposed by Complaint Counsel.
- Q. Dr. Bruce A. Harris – ENH Department of Emergency Medicine and Attending at HPH Emergency Department. Dr. Harris may be called to testify about, without limitation, the effect of the merger on emergency services at HPH, the accomplishments of the merger, and the impact on the community of the remedy proposed by Complaint Counsel.
- R. Dr. Leon Dragon – ENH Medical Director, Kellogg Cancer Care Center at HPH. Dr. Dragon may be called to testify about, without limitation, the effect of the merger on oncology services at HPH, the accomplishments of the merger, and the impact on the community of the remedy proposed by Complaint Counsel.
- S. Dr. Michael Ankin – An Independent Practitioner with appointment as Senior Associate in Pulmonary and Critical Care at HPH. Dr. Ankin may be called to testify about, without limitation, the effect of the merger on intensive care services at HPH, the accomplishments of the merger, and the impact on the community of the remedy proposed by Complaint Counsel.
- T. Heidi Krasne, R.N. – ENH Clinical Nurse Manager at HPH. Ms. Krasne may be called to testify about, without limitation, the effect of the merger on nursing care services at HPH, the accomplishments of the merger, and the impact on the community of the remedy proposed by Complaint Counsel.

- U. Stanley Kent, MS, RPh – ENH Assistant Vice President, Pharmacy Services. Mr. Kent may be called to testify about, without limitation, the effect of the merger on pharmacy services, the accomplishments of the merger, and the impact on the community of the remedy proposed by Complaint Counsel.
- V. Respondents reserve the right to call as witnesses the following ENH employees: Stephen Smith; Barbara DeMartin; Karen Mayer, R.N.; and Nancy Semerdjian. One or more of these witnesses may be called to testify about, without limitation, the allegations in Count III and quality of care at ENH.
- W. Respondents reserve the right to call as witnesses the following ENH Medical Group employees: Thomas A. Victor, M.D.; John Coyle, M.D.; Norman Gutmann, M.D.; Janardan Khandekar, M.D.; and Richard Silver, M.D. One or more of these witnesses may be called to testify about, without limitation, the allegations in Count III and quality of care at ENH.
- X. Respondents reserve the right to call as witnesses the following physicians: physicians affiliated with Ravinia Medical Group and/or Amy Roger; Jay Alexander, M.D. One or more of these witnesses may be called to testify, without limitation, the allegations in Count III and/or quality of care at ENH.

2. Consultants Retained by ENH:

- A. Jon Kaplan – formerly with Cap Gemini. Mr. Kaplan may be called to testify about the condition of legacy HPH, HPH’s financials and the due diligence concerning the merger.
- B. Ken Herlin –Ernst & Young, LLP. Mr. Herlin may be called to testify about the condition of legacy HPH, HPH’s financials and the due diligence concerning the merger.
- C. Chuck Farkas – Bain Consulting. Mr. Farkas may be called to testify about ENH’s engagement of Bain Consulting concerning the merger, NHN’s engagement of Bain Consulting concerning its operations, and matters addressed in his investigational hearing and other related topics.
- D. Kim Ogden – formerly with Bain Consulting. Ms. Ogden may be called to testify about ENH’s engagement of Bain Consulting concerning the merger, and NHN’s engagement of Bain Consulting concerning its operations.
- E. Phyllis Yale – Bain Consulting. Ms. Yale may be called to testify about ENH’s engagement of Bain Consulting concerning the merger, and NHN’s engagement of Bain Consulting concerning its operations.

- F. Michael Englehart – Deloitte Consulting. Mr. Englehart may be called to testify about ENH’s engagement of Deloitte & Touche concerning its evaluations of the merger and of ENH’s pricing.
  - G. Lou Porn – Deloitte Consulting. Mr. Porn may be called to testify about ENH’s engagement of Deloitte & Touche concerning its evaluations of the merger and of ENH’s pricing.
  - H. Jason Sussman – Kaufman Hall Associates. Mr. Sussman may be called to testify about ENH’s engagement of Kaufman Hall Associates concerning HPH’s pre-merger financial condition, merger due diligence and other topics related to Kaufman Hall’s work for HPH.
  - I. Kenneth Kaufman – Kaufman Hall Associates. Mr. Kaufman may be called to testify about ENH’s engagement of Kaufman Hall Associates concerning HPH’s pre-merger financial condition, merger due diligence and other topics related to Kaufman Hall’s work for HPH.
4. Respondents reserve the right to call as witnesses physicians on the medical staff of Highland Park Hospital who cannot be identified at this time.
  5. Respondents reserve the right to call as witnesses physicians on the medical staff of Evanston Hospital or Glenbrook Hospital who cannot be identified at this time.
  6. Respondents reserve the right to call as witnesses current or former employees who cannot be identified at this time of ENH, Faculty Practice Associates, Inc., ENH Medical Group, Inc., Lakeland Health Services, Inc., Highland Park Hospital, Northwestern Healthcare Network and their related companies.

PRIVATE PAYORS AND THEIR REPRESENTATIVES

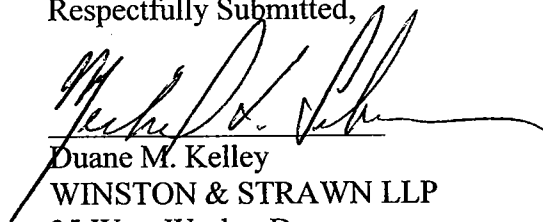
1. Respondents reserve the right to call at trial any or all of the individuals currently or formerly employed by private payors identified in any of Complaint Counsel's witness lists, deposed during discovery or in the underlying investigation, or identified in the course of discovery as having information relevant to the Complaint or Respondents' Answer and defenses.
2. Respondents reserve the right to issue notices of deposition to private payors pursuant to 16 C.F.R. § 3.33(c), and to call at trial representatives from these private payors.

OTHER WITNESSES

1. Thomas G. O’Rielly – ITW Corporation. Mr. O’Rielly may be called to testify about ITW’s purchase of health benefits for its employees and the merger.

2. Respondents reserve the right to depose hospital entities – including, but not limited to, Condell Medical Center, Lake Forest Hospital, Rush North Shore Medical Center, Holy Family/Resurrection Health Care, St. Francis Hospital, Advocate Health Network, Lutheran General Hospital, Northwestern Memorial Hospital, Children's Memorial, Resurrection Medical Center, St. Therese Medical Center, St. Alexius Medical Center, Methodist Hospital of Chicago, Northwest Community Hospital, Swedish Covenant Hospital, Victory Medical Center, The University of Chicago Hospital, and Louis A. Weiss Memorial Hospital – pursuant to 16 C.F.R. § 3.33(c) and to call at trial representatives from these hospitals.
3. Respondents reserve the right to depose or call as a witness at trial any witness not mentioned above who is (1) identified on any of Complaint Counsel's witness lists, (2) deposed during discovery or in the underlying investigation, or (3) called by Complaint Counsel to testify at trial.
4. Respondents reserve the right to add names necessary for rebuttal, expert witnesses, supplementary witnesses and additional persons identified in the course of discovery as having information relevant to the complaint or Respondents' answer and defenses. Respondents further reserve the right not to call any of the persons listed herein to testify at trial, as circumstances may warrant.

Respectfully Submitted,



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*Attorneys for Respondents*

**CERTIFICATE OF SERVICE**

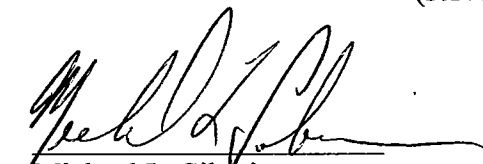
I hereby certify that on August 13, 2004, a copy of the foregoing Respondents' Revised Witness List was served by email and first class mail, postage prepaid, on:

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