

**UNITED STATES OF AMERICA  
BEFORE FEDERAL TRADE COMMISSION**

**PUBLIC**

\_\_\_\_\_ )  
**In the Matter of** )

**NORTH TEXAS SPECIALTY PHYSICIANS,** )

**a corporation.** )  
\_\_\_\_\_ )

**Docket No. 9312**

**COMPLAINT COUNSEL’S MOTION FOR THE ISSUANCE OF *SUBPOENAS AD TESTIFICANDUM***

Pursuant to Rule 3.34(a)(2) of the Federal Trade Commission’s Rules of Complaint, Counsel moves for an Order authorizing the issuance of ten subpoenas *ad testificandum* to be issued to: David C. Beaty, David Bird, Celina F. Burns, Rick Grizzle, Rick Haddock, Chris L. Jagmin, M.D., Jim Mosley, Thomas J. Quirk, David M. Roberts and William Sterling Vance, Jr., M.D. Each of these individuals is located within the United States as indicated on the attached List of Business Addresses for Complaint Counsel’s Witnesses.

The testimony of each of these individuals is reasonably relevant to Complaint Counsel’s prosecution of this matter and, thus, satisfies the conditions under Rule 3.34(a)(2) for the issuance of a subpoena *ad testificandum* to give testimony at an adjudicative hearing. Each of these individuals, as well as a brief description of each individual’s position and relevance to Complaint Counsel’s case is listed on Complaint Counsel’s Final Witness List.

Complaint Counsel reserves the right to subpoena additional witnesses for trial.

Respectfully submitted,

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Theodore Zang, Jr.

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

DATED: April 15, 2004

List of Business Addresses for Complaint Counsel's Witnesses

David C. Beaty, Senior Network, Account Manager  
United HealthCare  
United HealthCare of Texas, Inc.  
5800 Granite Parkway, Suite 900  
Plano, Texas 75024

David Bird, Contractor  
CIGNA Healthcare  
7400 West 110<sup>th</sup> Street, Suite 400  
Overland Park, Kansas 66210

Celina F. Burns, Western Regional Vice President, National Accounts Group Insurance  
The Prudential Insurance Company of America  
8117 Preston Road, Suite 600  
Dallas, Texas 75225

Rick Grizzle, Vice President, Network Development  
CIGNA Healthcare  
6600 East Campus Circle Drive  
Irving, Texas 75063

Rick Haddock, c/o Neill Fleishman, Esq.  
Blue Cross Blue Shield of Dallas, TX  
901 South Central Expressway  
Richardson, Texas 75080

Jim Mosley, Benefits Consultant  
Effective Plan Management, Inc.  
104 Houston Street, Suite B  
Roanoke, Texas 76262

Thomas J. Quirk, Chief Executive Officer and President  
United HealthCare  
United HealthCare of Texas, Inc.  
5800 Granite Parkway, Suite 900  
Plano, Texas 75024

Chris L. Jagmin, MD, Medical Director, Patient Management

AETNA, Inc.  
2777 Stemmons Freeway  
Dallas, Texas 75207

David M. Roberts, Market Network Head, Network Management  
AETNA, Inc.  
2777 Stemmons Freeway, Suite 300  
Dallas, Texas 75207

William Sterling Vance, Jr., MD  
Consultants in Cardiology  
1300 W. Terrell, Suite 500  
Fort Worth , TX 76104