

**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 EIGHTH 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. “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 Hospital**

[REDACTED]

1700. The document attached to this Request for Admissions as Exhibit CX-05177 is authentic, genuine, and a true and correct copy of a contract between [REDACTED] and Highland Park, effective [REDACTED]. The contract is a business record of one or both contracting parties. The contract is admissible into evidence in this matter.
1701. The document attached to this Request for Admissions as Exhibit CX-05178 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-

05177. The amendment is a business record of one or both parties to the amendment.  
The amendment is admissible into evidence in this matter.
1702. The document attached to this Request for Admissions as Exhibit CX-05179 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05177. The [REDACTED] amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1703. The document attached to this Request for Admissions as Exhibit CX-05180 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05177. The amendment is a business record of one or both parties to the amendment.  
The amendment is admissible into evidence in this matter.
1704. The document attached to this Request for Admissions as Exhibit CX-05181 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05177. The [REDACTED] amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1705. The document attached to this Request for Admissions as Exhibit CX-05182 is authentic, genuine, and a true and correct copy of an amendment (plus an [REDACTED] memorandum and a related document), effective [REDACTED], to CX-05177. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1706. The document attached to this Request for Admissions as Exhibit CX-05183 is authentic, genuine, and a true and correct copy of an amendment (plus two letters), effective [REDACTED], to CX-05177. The amendment is a business record of one or both

- parties to the amendment. The amendment is admissible into evidence in this matter.
1707. Exhibits CX-05177 through CX-05183 constitute an authentic, genuine, true and correct copy of the complete set of the [REDACTED] contracts and amendments (plus a memorandum, two letters, and another document) between [REDACTED] and Highland Park from [REDACTED]. This set of exhibits is admissible into evidence in this matter.
1708. The document attached to this Request for Admissions as Exhibit CX-05184 is authentic, genuine, and a true and correct copy of a termination notice, effective [REDACTED], to CX-05177. The [REDACTED] termination notice is a business record of one or both parties to the termination notice. The termination notice is admissible into evidence in this matter.
1709. Exhibit CX-05184 constitutes an authentic, genuine, true and correct copy of the complete set of the termination notices between [REDACTED] and Highland Park from [REDACTED]. This set of an exhibit is admissible into evidence in this matter.
1710. The document attached to this Request for Admissions as Exhibit CX-05185 is authentic, genuine, and a true and correct copy of a consent to assignment, 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.
1711. Exhibit CX-05185 constitutes an authentic, genuine, true and correct copy of the complete set of the consents to assignment between [REDACTED] and Highland Park from [REDACTED]. This set of an exhibit is admissible into

evidence in this matter.

**Evanston Northwestern Healthcare**

[REDACTED]

[REDACTED]

1712. The document attached to this Request for Admissions as Exhibit CX-05186 is authentic, genuine, and a true and correct copy of a contract between [REDACTED] and Evanston Northwestern Healthcare, effective [REDACTED]. The contract is a business record of one or both contracting parties. The contract is admissible into evidence in this matter.
1713. The document attached to this Request for Admissions as Exhibit CX-05187 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05186. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1714. The document attached to this Request for Admissions as Exhibit CX-05188 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05186. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1715. The document attached to this Request for Admissions as Exhibit CX-05189 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05186. The [REDACTED] amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1716. The document attached to this Request for Admissions as Exhibit CX-05190 is authentic,

genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05186. The amendment is a business record of one or both parties to the amendment.

The amendment is admissible into evidence in this matter.

1717. The document attached to this Request for Admissions as Exhibit CX-05191 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05186. The amendment is a business record of one or both parties to the amendment.

The amendment is admissible into evidence in this matter.

1718. The document attached to this Request for Admissions as Exhibit CX-05192 is authentic, genuine, and a true and correct copy of an amendment (plus a cover sheet), effective [REDACTED], to CX-05186. The [REDACTED] amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.

1719. The document attached to this Request for Admissions as Exhibit CX-05193 is authentic, genuine, and a true and correct copy of an amendment (plus a cover letter), effective [REDACTED], to CX-05186. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.

1720. The document attached to this Request for Admissions as Exhibit CX-05194 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05186. The [REDACTED] amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.

1721. The document attached to this Request for Admissions as Exhibit CX-05195 is authentic, genuine, and a true and correct copy of an amendment (plus a cover letter), effective

[REDACTED], to CX-05186. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.

1722. The document attached to this Request for Admissions as Exhibit CX-05196 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05186. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.

1723. The document attached to this Request for Admissions as Exhibit CX-05197 is authentic, genuine, and a true and correct copy of an amendment (plus a cover letter), effective [REDACTED] to CX-05186. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.

1724. The document attached to this Request for Admissions as Exhibit CX-05198 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05186. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.

1725. The document attached to this Request for Admissions as Exhibit CX-05199 is authentic, genuine, and a true and correct copy of an amendment (plus a cover letter), effective [REDACTED], to CX-05186. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.

1726. Exhibits CX-05186 through CX-05199 constitute an authentic, genuine, true and correct copy of the complete set of the [REDACTED] contracts and amendments (plus some attached papers) between [REDACTED] and Evanston Northwestern Healthcare issued from [REDACTED]. This set of exhibits is admissible

into evidence in this matter.

1727. The document attached to this Request for Admissions as Exhibit CX-05200 is authentic, genuine, and a true and correct copy of an amendment (plus a cover memorandum), effective [REDACTED], to CX-05186. The [REDACTED] amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1728. The document attached to this Request for Admissions as Exhibit CX-05201 is authentic, genuine, and a true and correct copy of an amendment (plus a fax transmittal sheet), signed on [REDACTED], to CX-05186. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1729. The document attached to this Request for Admissions as Exhibit CX-05202 is authentic, genuine, and a true and correct copy of an amendment (plus an attached page), effective [REDACTED], to CX-05186. The [REDACTED] amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1730. The document attached to this Request for Admissions as Exhibit CX-05203 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05186. The [REDACTED] amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1731. Exhibits CX-05200 through CX-05203 constitute an authentic, genuine, true and correct copy of the complete set of the [REDACTED] contracts and amendments (plus some



attached papers) between [REDACTED] and Evanston Northwestern Healthcare issued from [REDACTED]. This set of exhibits is admissible into evidence in this matter.

[REDACTED]

1732. The document attached to this Request for Admissions as Exhibit CX-05204 is authentic, genuine, and a true and correct copy of an amendment, effective in [REDACTED], to CX-05186. The [REDACTED] amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1733. The document attached to this Request for Admissions as Exhibit CX-05205 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05186. The [REDACTED] amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1734. The document attached to this Request for Admissions as Exhibit CX-05206 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05186. The [REDACTED] amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1735. The document attached to this Request for Admissions as Exhibit CX-05207 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05186. The [REDACTED] amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1736. Exhibits CX-05204 through CX-05207 constitute an authentic, genuine, true and correct copy of the complete set of the [REDACTED] contracts and

amendments between [REDACTED] and Evanston Northwestern Healthcare issued from [REDACTED]. This set of exhibits is admissible into evidence in this matter.

1737. The document attached to this Request for Admissions as Exhibit CX-05200 is authentic, genuine, and a true and correct copy of an amendment (plus a cover memorandum), effective [REDACTED], to CX-05186. The [REDACTED] amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.

1738. Exhibit CX-05200 constitutes an authentic, genuine, true and correct copy of the complete set of the [REDACTED] contracts and amendments (plus a cover memorandum) between [REDACTED] and Evanston Northwestern Healthcare issued from [REDACTED]. This set of an exhibit is admissible into evidence in this matter.

[REDACTED]

1739. Exhibits CX-05186 through CX-05199 and CX-5204 through CX-5207 constitute an authentic, genuine, true and correct copy of the complete set of the [REDACTED] contracts and amendments (plus some attached papers) between [REDACTED] and Evanston Northwestern Healthcare from [REDACTED]. This set of exhibits is admissible into evidence in this matter.

1740. Exhibits CX-05200 through CX-05203 constitute an authentic, genuine, true and correct copy of the complete set of the [REDACTED] contracts and amendments (plus some attached papers) between [REDACTED] and Evanston Northwestern

Healthcare issued from [REDACTED]. This set of exhibits is admissible into evidence in this matter.

1741. The document attached to this Request for Admissions as Exhibit CX-05185 is authentic, genuine, and a true and correct copy of a consent to assignment, 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.
1742. Exhibit CX-05185 constitutes an authentic, genuine, true and correct copy of the complete set of the consents to assignment between [REDACTED] and Evanston Northwestern Healthcare from [REDACTED]. This set of an exhibit is admissible into evidence in this matter.

[REDACTED]

1743. The document attached to this Request for Admissions as Exhibit CX-05208 is authentic, genuine, and a true and correct copy of a contract between [REDACTED] and Evanston Northwestern Healthcare, made on [REDACTED]. The [REDACTED] contract is a business record of one or both contracting parties. The contract is admissible into evidence in this matter.
1744. The document attached to this Request for Admissions as Exhibit CX-05209 is authentic, genuine, and a true and correct copy of an amendment (plus a letter), effective [REDACTED] to CX-05208. The [REDACTED] amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1745. Exhibits CX-05208 through CX-05209 constitute an authentic, genuine, true and correct

copy of the complete set of the [REDACTED] contracts and amendments (plus a letter) between [REDACTED] and Evanston Northwestern Healthcare from [REDACTED].

This set of exhibits is admissible into evidence in this matter.

1746. The document attached to this Request for Admissions as Exhibit CX-05210 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05208. The amendment is a business record of one or both parties to the amendment.

The amendment is admissible into evidence in this matter.

1747. Exhibits CX-05208 through CX-05210 constitute an authentic, genuine, true and correct copy of the complete set of the [REDACTED] contracts and amendments (plus a letter) between [REDACTED] and Evanston Northwestern Healthcare from [REDACTED].

This set of exhibits is admissible into evidence in this matter.

#### Attachments

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Thomas Brock  
Philip Eisenstat  
Paul Nolan  
Renée Henning  
Nancy Park  
Counsel Supporting the Complaint  
Bureau of Competition  
Federal Trade Commission  
Washington, D.C. 20580  
Telephone (202) 326-2813  
Facsimile (202) 326-2884

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:

Michael Sibarium, Esquire  
WINSTON & STRAWN  
1400 L Street, N.W.  
Washington, D.C. 20005

Charles Klein, Esquire  
WINSTON & STRAWN  
1400 L Street, N.W.  
Washington, D.C. 20005

Duane Kelley, Esquire  
WINSTON & STRAWN  
35 West Wacker Drive  
Chicago, IL 60601

Michael T. Hannafan, Esquire  
Michael T. Hannafan & Associates, Ltd.  
One East Wacker Drive  
Suite 1208  
Chicago, IL 60601

and delivery of two copies to:

The Honorable Stephen J. McGuire  
Federal Trade Commission  
600 Pennsylvania Avenue  
Room 113  
Washington, D.C. 20580

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