

**UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION**

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

**COMPLAINT COUNSEL’S TENTH 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]

1759. The document attached to this Request for Admissions as Exhibit CX-05218 is authentic, genuine, and a true and correct copy of a contract (including an amendment signed [REDACTED]) 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.

1760. Exhibit CX-05218 constitutes an authentic, genuine, true and correct copy of the complete set of the contracts and amendments between [REDACTED] and Highland Park from [REDACTED]. This set of an exhibit is admissible into evidence in this matter.

[REDACTED]

1761. The document attached to this Request for Admissions as Exhibit CX-05219 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.

1762. The document attached to this Request for Admissions as Exhibit CX-05220 is authentic, genuine, and a true and correct copy of an amendment, signed [REDACTED], to CX-05219. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.

1763. The document attached to this Request for Admissions as Exhibit CX-05221 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05219. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.

1764. The document attached to this Request for Admissions as Exhibit CX-05222 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05219. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.

1765. Exhibits CX-05219 through CX-05222 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.
1766. The document attached to this Request for Admissions as Exhibit CX-05223 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.
1767. Exhibit CX-05223 constitutes an authentic, genuine, true and correct copy of the complete set of the [REDACTED] 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]

1768. The document attached to this Request for Admissions as Exhibit CX-05224 is authentic, genuine, and a true and correct copy of a contract (including an amendment signed [REDACTED]) (plus a cover sheet) 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.
1769. The document attached to this Request for Admissions as Exhibit CX-05225 is authentic, genuine, and a true and correct copy of two amendments (plus three letters), effective

- [REDACTED], to CX-05224. The amendments are a business record of one or both parties to the amendment. The amendments are admissible into evidence in this matter.
1770. The document attached to this Request for Admissions as Exhibit CX-05226 is authentic, genuine, and a true and correct copy of an amendment (plus a cover letter), effective [REDACTED], to CX-05224. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1771. The document attached to this Request for Admissions as Exhibit CX-05227 is authentic, genuine, and a true and correct copy of an amendment (plus a cover letter), effective [REDACTED], to CX-05224. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1772. Exhibits CX-05224 through CX-05227 constitute an authentic, genuine, true and correct copy of the complete set of the contracts and amendments (plus five letters and a cover sheet) between [REDACTED] and Evanston Northwestern Healthcare from [REDACTED]. This set of exhibits is admissible into evidence in this matter.
1773. The document attached to this Request for Admissions as Exhibit CX-05228 is authentic, genuine, and a true and correct copy of an amendment between [REDACTED] (acting in its capacity as owner and operator of [REDACTED]) and Evanston Northwestern Healthcare, effective [REDACTED], to CX-05224. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1774. The document attached to this Request for Admissions as Exhibit CX-05229 is authentic,

genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05224. The [REDACTED] amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.

1775. Exhibits CX-05228 through CX-05229 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.

[REDACTED]

1776. The document attached to this Request for Admissions as Exhibit CX-05230 is authentic, genuine, and a true and correct copy of a contract (including an amendment signed [REDACTED]) 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.
1777. The document attached to this Request for Admissions as Exhibit CX-05231 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05230. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1778. The document attached to this Request for Admissions as Exhibit CX-05232 is authentic, genuine, and a true and correct copy of an amendment (plus a cover letter), effective [REDACTED], to CX-05230. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.

1779. The document attached to this Request for Admissions as Exhibit CX-05233 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05230. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1780. The document attached to this Request for Admissions as Exhibit CX-05234 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05230. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1781. Exhibits CX-05230 through CX-05234 constitute 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 exhibits is admissible into evidence in this matter.
1782. The document attached to this Request for Admissions as Exhibit CX-05235 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05230. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1783. Exhibit CX-05235 constitutes 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 an exhibit 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:

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Thomas Brock