

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

_____)	
In the matter of)	
)	
Evanston Northwestern Healthcare Corporation,)	Docket No. 9315
)	
and)	
)	
ENH Medical Group, Inc.,)	
Respondents.)	
_____)	

STIPULATION REGARDING INTERSTATE COMMERCE

The Federal Trade Commission and Evanston Northwestern Healthcare Corporation (“ENH”) and ENH Medical Group, Inc. (“ENHMG”) (collectively, "Respondents"), through their respective attorneys, stipulate that:

1. At all times relevant to the Complaint, Respondents, which are located in Evanston, Illinois, were and are engaged in interstate commerce and activities affecting interstate commerce in the delivery of health care services.
2. At all times relevant to the Complaint, Respondents have received and continue to receive combined payments for the delivery of health care services well in excess of \$10 million in each year from 1999 through 2003 from the following companies and/or their

subsidiaries:

- a. Aetna, Inc., with its corporate headquarters in Hartford, Connecticut;
 - b. Cigna Corporation, with its corporate headquarters in Philadelphia, Pennsylvania.
 - c. Humana Inc., with its corporate headquarters in Louisville, Kentucky.
 - d. United Healthcare, with its corporate headquarters in Minneapolis, Minnesota.
 - e. Private HealthCare Systems, with its corporate headquarters in Waltham, Massachusetts.
 - f. Great-West Healthcare, with its corporate headquarters located in Greenwood Village, Colorado.
 - g. Preferred Plan, with its corporate headquarters located in Stow, Ohio.
3. At all times relevant to the Complaint, Respondent ENH and the ENH Faculty Practice Associates (the ENH-employed physician group), have received and continue to receive in the aggregate significant payments from the federal Medicare Program, 42 U.S.C. §§ 1395 *et seq.*, and the federal/state Medicaid program, 42 U.S.C. §§ 1396 *et seq.*
4. At all times relevant to the Complaint, ENH, through its operations at Evanston Hospital, Glenbrook Hospital, and Highland Park Hospital, has engaged and continues to engage in commerce and in activities affecting commerce, as the term “commerce” is defined by Section 1 of the Clayton Act. 15 U.S.C. § 12.

5. At all times relevant to the Complaint, ENHMG has engaged and continues to engage in commerce, as the term “commerce” is defined by section 4 of the Federal Trade Commission Act. 15 U.S.C. § 44.

Dated: August ____, 2004

FOR THE FEDERAL TRADE
COMMISSION:

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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing documents were served on counsel for the respondent by electronic mail and first class mail delivery:

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and delivery of two copies to:

The Honorable Stephen J. McGuire
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Date

Thomas H. Brock, Esq.
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