

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

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

**THIRD PARTY BLUE CROSS BLUE SHIELD OF ILLINOIS’ MOTION FOR
EXTENSION OF TIME TO FILE A REQUEST FOR *IN CAMERA* TREATMENT OF
PROPOSED TRIAL EXHIBITS**

In accordance with Commission Rule § 4.3(b), Third Party Blue Cross Blue Shield of Illinois (“BCBSI”) respectfully submits this Motion For Extension Of Time To File A Request For *In Camera* Treatment Of Proposed Trial Exhibits until January 10, 2005. Currently, BCBSI’s motion is due January 4, 2005.

BCBSI requests this short extension of time because its employees and counsel have limited ability to review the documents at issue and prepare the required papers given the intervening Christmas and New Year’s holidays. BCBSI received notice of Complaint Counsel’s intent to use certain documents as trial exhibits on December 13, 2004, and received a similar notice from Respondents’ Counsel on December 15, 2004. Together, Complaint Counsel and Respondents have indicated that they intend to offer into evidence more than 80 BCBSI documents, amounting to more than 400 pages of material, much of which contains competitively sensitive rate information. BCBSI and counsel must undertake a careful review of these documents to identify information that, if disclosed, would cause clearly defined and

serious injury to BCBSI and would merit *in camera* treatment. Due to the Christmas and New Year's holidays, BCBSI will not have adequate time to conduct this review prior to the current January 4, 2005 deadline.

BCBSI respectfully submits that the extension of time requested will not delay or disrupt the underlying litigation. Undersigned counsel has been in contact with Complaint Counsel and counsel for Respondents. Counsel for the parties do not object to the extension requested. Further, they anticipate that they will be able to respond to BCBSI's motion for *in camera* treatment by the current deadline of January 18, 2005 in the event BCBSI's requested extension is granted.

WHEREFORE, for these and such other reasons as may appear just to the Court, BCBSI respectfully petitions this Court for an Order extending the deadline for BCBSI's motion for *in camera* treatment of proposed trial exhibits until January 10, 2005. A proposed order is attached for the benefit of the Court.

DATED: December 27, 2004

Respectfully submitted,

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ORDER

Upon consideration of Third Party Blue Cross Blue Shield of Illinois' ("BCBSI") Motion For Extension Of Time To File A Request For *In Camera* Treatment Of Proposed Trial Exhibits, any opposition thereto, and the Court being fully informed,

IT IS HEREBY ORDERED that BCBSI's Motion is GRANTED.

IT IS FURTHER ORDERED that BCBSI shall file any such request for *in camera* treatment by January 10, 2005.

Stephen J. McGuire
Administrative Law Judge

DATE: _____

CERTIFICATE OF SERVICE

I hereby certify that on December 27, 2004, a copy of the foregoing Third Party Blue Cross Blue Shield's Motion For Extension of Time to Request In Camera Treatment of Proposed Trial Exhibits was served by email and first class mail, postage prepaid, on:

The Honorable Stephen J. McGuire
Chief Administrative Law Judge
Federal Trade Commission
600 Pennsylvania Avenue, NW (H-106)
Washington, DC 20580
(two courtesy copies delivered by messenger only)

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