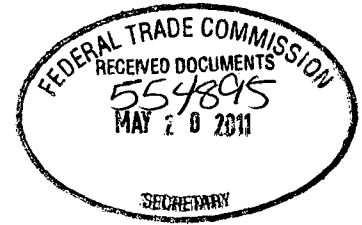


**ORIGINAL**



**UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION  
OFFICE OF ADMINISTRATIVE LAW JUDGES**

**In the Matter of**  
**ProMedica Health System, Inc.**  
**a corporation**

**DOCKET NO. 9346**  
**PUBLIC VERSION**

**MDA Engineering, Inc. MOTION FOR *IN CAMERA* TREATMENT**  
**OF HEARING EXHIBITS**

**I. Introduction**

MDA Engineering, Inc respectfully moves for *in camera* treatment of several proposed exhibits, pursuant to Rule 3.45 of the Federal Trade Commission's Rules of Practice.

The first exhibit relates to the declaration presented by Craig R. Kohring to the Federal Trade Commission on October 4, 2010. Paragraph 2 of this Declaration discusses confidential business information, which if disclosed, could harm the company's competitive stature in the marketplace. The remaining exhibits are files produced to Attorneys McDermott, Will and Emory LLP dated March 10, 2011 that include Medical billings, Health Insurance quotations, and Health Insurance renewal rates.

**II. Discussion**

Rule 3.45 (b) requires that material constituting sensitive personal information be given permanent *in camera* treatment. The rule notes that "sensitive personal information" includes

sensitive health information identifiable by individual, such as an individuals' medical records. These files also contain information that is likely to be competitively sensitive, including referral sources, billed charges and payer information.

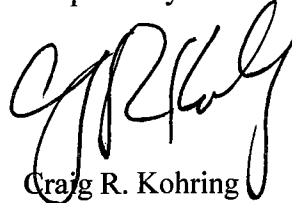
### **III. Conclusion**

Disclosure of the information contained in these documents and the data files will likely result in serious competitive injury or will result in the disclosure of sensitive health information. Disclosure would not materially promote the resolution of this matter not assist the public's understanding of the litigation, particularly in light of the copious other evidence and testimony likely to be available to the public. *In camera* treatment is therefore appropriate.

For the foregoing reason, MDA Engineering Inc. requests that the identified exhibits receive *in camera* treatment.

Dated: May 17, 2011

Respectfully Submitted,



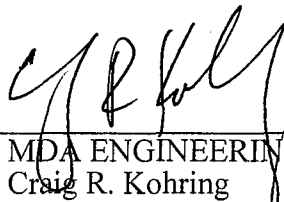
Craig R. Kohring  
Chief Financial Officer  
MDA Engineering, Inc.

## CERTIFICATE OF SERVICE

I hereby certify that on May 18, 2011, I filed *via* first-class mail a paper original of the **Filing of Motions Seeking *In Camera* Treatment** with:

Fenice Wade  
Office of the Secretary  
Federal Trade Commission  
600 Pennsylvania Avenue, NW, Room 110  
Washington, DC 20580  
[fwade@ftc.gov](mailto:fwade@ftc.gov)

The Honorable D. Michael Chappell  
Chief Administrative Law Judge  
Federal Trade Commission  
600 Pennsylvania Avenue, NW, H-106  
Washington, DC 20580  
[oalj@ftc.gov](mailto:oalj@ftc.gov)



---

MDA ENGINEERING, INC  
Craig R. Kohring  
1415 Holland Road  
Maumee, OH 43537  
419-893-3141  
[ckohring@mdaenr.com](mailto:ckohring@mdaenr.com)