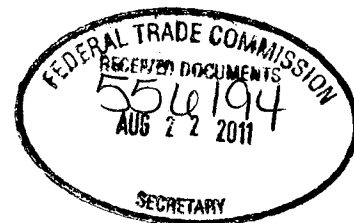


**ORIGINAL**

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



In the Matter of )  
 )  
 PROMEDICA HEALTH SYSTEM, INC., )  
 )  
 a corporation )  
 )

Docket No. 9346  
**PUBLIC**

**JOINT STIPULATED MOTION TO ADMIT  
ADDITIONAL EXHIBITS INTO EVIDENCE**

Pursuant to Rule 3.22 of the Federal Trade Commission's Rules of Adjudicative Practice and Paragraph 14 of the Scheduling Order, Complaint Counsel and Respondent ProMedica Health System, Inc. respectfully move to admit additional exhibits into evidence. The parties jointly stipulate to admit into evidence the documents listed in the table at Appendix 1.<sup>1</sup>

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<sup>1</sup> A supplemental motion for *in camera* treatment of certain documents will be filed on August 23, 2011.

Respectfully submitted,

/s/ Jeanne H. Liu

By: JEANNE H. LIU

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*Attorneys for Respondent ProMedica  
Health System, Inc.*

Dated: August 22, 2011

CERTIFICATE OF SERVICE

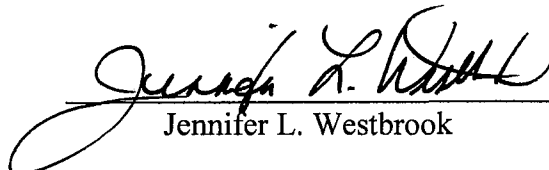
I, Jennifer L. Westbrook, hereby certify that I served a true and correct copy of the foregoing Respondent's Joint Stipulated Motion to Admit Additional Exhibits into Evidence, upon the following individuals by hand on August 22, 2011.

Hon. D. Michael Chappell  
Chief Administrative Law Judge  
Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Room H110  
Washington, DC 20580

Donald S. Clark  
Secretary  
Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Room 172  
Washington, DC 20580

I, Jennifer L. Westbrook, hereby certify that I served a true and correct copy of the foregoing Joint Stipulated Motion to Admit Additional Exhibits into Evidence, upon the following individuals by electronic mail on August 22, 2011.

Matthew J. Reilly  
Jeffrey H. Perry  
Sara Y. Razi  
Jeanne H. Liu  
Alexis J. Gilman  
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Jennifer L. Westbrook

**APPENDIX 1**

**Table of Additional Exhibits to be Admitted into Evidence**

<b><u>RX or PX Number</u></b>	<b><u>Begin Bates Number</u></b>	<b><u>End Bates Number</u></b>
<b>RX-2160</b>	PHS0011930	PHS0011930
<b>RX-2161</b>	PHS0616396	PHS0616408
<b>RX-2162</b>	SLH0023647	SLH0023648
<b>RX-2163</b>	STL STL08 00059784	STL STL08 00059785
<b>RX-2164</b>	STL STL08 00059786	STL STL08 00059786
<b>RX-2165</b>	STL STL08 00059787	STL STL08 00059787
<b>RX-2166</b>	STL STL08 00059788	STL STL08 00059789
<b>RX-2167</b>	STL STL08 00059790	STL STL08 00059790
<b>RX- 2168</b>	Margaret Guerin-Calvert Expert Report Backup Materials	
<b>PX00913</b>	PHS PHS32 00053112	PHS PHS32 00053113
<b>PX00171</b>	PHS0009319	PHS0009319
<b>PX00257</b>	PHS0126403	PHS0126407
<b>PX00920</b>	PM_SL_00125142	PM_SL_00125143
<b>PX00921</b>	PM_SL_00125146	PM_SL_00125147
<b>PX00923</b>	PM_SL_00141397	PM_SL_00141397
<b>PX00924</b>	PM_SL_00141955	PM_SL_00141955
<b>PX00905</b>	PM_SL_00343811	PM_SL_00343811
<b>PX00917</b>	PM_SL_01065944	PM_SL_01065944
<b>PX00915</b>	PM_SL_01291869	PM_SL_01291870
<b>PX01511</b>	SLH0024220	SLH0024226
<b>PX01617</b>	STL STL04 00098790	STL STL04 00098790
<b>PX00958</b>	Margaret Guerin-Calvert Part III 8/4/2011 Second Deposition Transcript	
<b>PX00916</b>	ProMedica 2009 IRS Form 990: Return of Organization Exempt From Income Tax	
<b>PX01818</b>	Robert Town Expert Reports Backup Programs	

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

In the Matter of )  
 )  
PROMEDICA HEALTH SYSTEM, INC. )  
 a corporation. )

Docket No. 9346

**[PROPOSED] ORDER GRANTING JOINT STIPULATED  
MOTION TO ADMIT ADDITIONAL EXHIBITS INTO EVIDENCE**

Upon consideration of Complaint Counsel and Respondent ProMedica Health System, Inc.'s Joint Stipulated Motion to Admit Additional Exhibits into Evidence, it is hereby ordered that the Motion is GRANTED for the exhibits in the table below.

<u>RX or PX Number</u>	<u>Begin Bates Number</u>	<u>End Bates Number</u>
RX-2160	PHS0011930	PHS0011930
RX-2161	PHS0616396	PHS0616408
RX-2162	SLH0023647	SLH0023648
RX-2163	STL STL08 00059784	STL STL08 00059785
RX-2164	STL STL08 00059786	STL STL08 00059786
RX-2165	STL STL08 00059787	STL STL08 00059787
RX-2166	STL STL08 00059788	STL STL08 00059789
RX-2167	STL STL08 00059790	STL STL08 00059790
RX- 2168	Margaret Guerin-Calvert Expert Report Backup Materials	
PX00913	PHS PHS32 00053112	PHS PHS32 00053113
PX00171	PHS0009319	PHS0009319
PX00257	PHS0126403	PHS0126407
PX00920	PM SL 00125142	PM SL 00125143
PX00921	PM SL 00125146	PM SL 00125147
PX00923	PM SL 00141397	PM SL 00141397
PX00924	PM SL 00141955	PM SL 00141955
PX00905	PM SL 00343811	PM SL 00343811
PX00917	PM SL 01065944	PM SL 01065944
PX00915	PM SL 01291869	PM SL 01291870
PX01511	SLH0024220	SLH0024226
PX01617	STL STL04 00098790	STL STL04 00098790
PX00958	Margaret Guerin-Calvert Part III 8/4/2011 Second Deposition	

	Transcript	
<b>PX00916</b>	ProMedica 2009 IRS Form 990: Return of Organization Exempt From Income Tax	
<b>PX01818</b>	Robert Town Expert Reports Backup Programs	

ORDERED: August \_\_, 2011.

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The Honorable D. Michael Chappell  
Chief Administrative Law Judge