

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

	)	
In the Matter of	)	
	)	
<b>Evanston Northwestern Healthcare Corporation,</b>	)	
a corporation, and	)	Docket No. 9315
	)	
<b>ENH Medical Group, Inc.,</b>	)	Public Filing
a corporation.	)	
	)	

**MOTION TO EXTEND TIME IN WHICH TO MOVE TO  
LIMIT SUBPOENA SERVED BY RESPONDENTS UPON  
THIRD PARTY AND TO SEEK COST REIMBURSEMENT**

Great-West Healthcare of Illinois, Inc. (“Great-West Healthcare”) hereby moves to extend the time, to and including June 4, 2004, in which it may move to limit the subpoena served upon it by Respondents, Evanston Northwestern Healthcare Corporation and ENH Medical Group, Inc. (collectively “Respondents”) and to seek cost reimbursement with respect to locating and producing documents in compliance with the subpoena. In support thereof Great-West Healthcare incorporates its extension motion filed herein on May 4, 2004, and further states the following:

1. Respondents have directed a subpoena to Great-West Health Care, requesting documents as set forth in 43 paragraphs and 26 subparagraphs (the “Subpoena”).
2. On May 17, 2004, the Administrative Law Judge granted Great-West Health Care until May 21, 2004 to move to limit or quash the Subpoena.
3. Counsel for Great-West Healthcare and Respondents have participated in a lengthy, point-by-point discovery conference pursuant to 16 C.F.R. §3.22(f). As a result, Great-

West Healthcare and Respondents have reached agreement on limiting the scope of the subpoena in certain respects. Great-West Healthcare has agreed to immediately provide Respondents with certain documents and to locate and provide other documents to Respondents, which Great-West Healthcare believes will substantially further limit the scope of the Subpoena. Further limiting of the scope of the Subpoena will require at least one additional discovery conference, which has been scheduled, and perhaps a second additional discovery conference.

4. Great-West Healthcare will locate and provide documents as to which there is no dispute and will not delay document production, notwithstanding any motion which it may file to limit the Subpoena should the parties be unable to reach complete agreement with respect to document production.

5. Great-West Healthcare intends to request the Administrative Law Judge to enter an order requiring Respondents to reimburse Great-West Healthcare for its costs in responding to the Subpoena. It will not, however, delay document production during the period that its cost reimbursement motion may be pending.

6. An extension of time, to and including June 4, 2004, for Great-West Health Care to file a motion to limit the Subpoena in the event the parties cannot reach complete agreement with respect to document production and to seek cost reimbursement with respect to locating and producing documents in compliance with the Subpoena is reasonable and appropriate under the foregoing circumstances.

**WHEREFORE**, Great-West Healthcare of Illinois, Inc. respectfully requests that the time in which it may move to limit the Subpoena and to seek cost reimbursement with respect to

locating and producing documents in compliance with the Subpoena be extended to and including June 4, 2004.

Dated: May 21, 2004

GREAT-WEST HEALTHCARE OF  
ILLINOIS, INC.

By: /s/ Franklin Schwerin  
One of its attorneys

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a corporation.	)	
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**ORDER**

Upon motion of Great-West Healthcare of Illinois, Inc. (“Great-West Healthcare”), it is hereby ordered that the time in which Great-West Healthcare may move to limit the subpoena served upon it by Respondents, Evanston Northwestern Healthcare Corporation and ENH Medical Group, Inc., and to seek cost reimbursement with respect to locating and producing documents in compliance with said subpoena is extended to and including June 4, 2004.

ENTER:

\_\_\_\_\_  
Administrative Law Judge

Prepared By:

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 21, 2004, a copy of the foregoing Motion To Extend Time In Which To Move To Limit Subpoena Served By Respondents Upon Third Party and to Seek Cost Reimbursement was served by overnight courier delivery on:

The Honorable Stephen J. McGuire  
Chief Administrative Law Judge  
Federal Trade Commission  
600 Pennsylvania Ave., N.W. (H-106)  
Washington, DC 20580

Thomas H. Brock, Esq.  
Federal Trade Commission  
600 Pennsylvania Ave., N.W. (H-374)  
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and by messenger on:

David Dahlquist, Esq.  
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/s/ Franklin Schwerin  
Franklin S. Schwerin