

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION DOCUMENT PROCESSING

In the matter of)
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)
Evanston Northwestern Healthcare)
Corporation,)
a corporation, and)
)
ENH Medical Group, Inc.,)
a corporation.)
)
)
_____)

Docket No. 9315

COMPLAINT COUNSEL'S PRELIMINARY WITNESS LIST

Pursuant to the Scheduling Order, Complaint Counsel hereby designates those persons whom may be called upon by Complaint Counsel to testify, by deposition or live testimony, at trial.

PAYER REPRESENTATIVES

1. Robert Mendonsa, General Manager Key Accounts, Aetna – Mr. Mendonsa may be called to testify, without limitation, about the operations of AETNA; contracting for general acute care inpatient hospital services; the contract and contract negotiations between ENH and ENH Medical Group and Aetna; matters addressed in his investigational hearing; and other related topics.
2. Joseph Arango, Director of Provider Contracting and Strategy, and Frank Nicholson, Blue Cross and Blue Shield of Illinois – Mr. Arango and Mr. Nicholson may be called to testify about, without limitation, the operations of Blue Cross and Blue Shield of Illinois; contracting for general acute care inpatient hospital services; the contract and contract negotiations between ENH and ENH Medical Group and Blue Cross; matters addressed in his investigational hearing; and other related topics.
3. Brian Jans, Director of Provider Networks, CCN – Mr. Jans may be called to testify about, without limitation, the operations of CCN; contracting for general acute care inpatient hospital services; the contract and contract negotiations between ENH and ENH Medical Group and United Health; matters addressed in his investigational hearing; and other related topics.

4. Sherry Husa, Regional Vice President Contracting, CIGNA– Ms. Husa may be called to testify about, without limitation, the operations of CIGNA; contracting for general acute care inpatient hospital services; the contract and contract negotiations between ENH and ENH Medical Group and CIGNA; matters addressed in his investigational hearing; and other related topics.
5. Ronald Craven, Vice President for Provider Networks, HFN – Mr. Craven may be called to testify about, without limitation, the operations of HFN; contracting for general acute care inpatient hospital services; the contract and contract negotiations between ENH and ENH Medical Group and HFN; matters addressed in his investigational hearing; and other related topics.
6. Paul Maxwell, Vice President, Humana – Mr. Maxwell may be called to testify about, without limitation, the operations of Humana; contracting for general acute care inpatient hospital services; the contract and contract negotiations between ENH and ENH Medical Group and Humana; matters addressed in his investigational hearing; and other related topics.
7. Kevin Dorsey, Vice President Network Development, One Health – Mr. Dorsey may be called to testify about, without limitation, the operations of One Health; contracting for general acute care inpatient hospital services; the contract and contract negotiations between ENH and and ENH Medical Group One Health; matters addressed in his investigational hearing; and other related topics.
8. Jane Ballengee, Regional Director of Network Development, Private Health Care Systems (“PHCS”) – Ms. Ballengee may be called to testify about, without limitation, the operations of PHCS; contracting for general acute care inpatient hospital services; the contract and contract negotiations between ENH and ENH Medical Group and PHCS; matters addressed in her investigational hearing; and other related topics.
9. James Crones, Preferred Plan – Mr. Crones may be called to testify about, without limitation, the operations of Preferred Plan; contracting for general acute care inpatient hospital services; the contract and contract negotiations between ENH and ENH Medical Group and Preferred Plan; matters addressed in his investigational hearing; and other related topics.
10. Lenore Holt Darcy, Regional Vice President Network Development, Unicare – Ms. Darcy may be called to testify about, without limitation, the operations of Unicare; contracting for general acute care inpatient hospital services; the contract and contract negotiations between ENH and ENH Medical Group and Unicare; and other related topics.
11. Jillian Foucre, COO, United Healthcare Illinois – Ms. Foucre may be called to testify about, without limitation, the operations of United Healthcare Illinois; contracting for

general acute care inpatient hospital services; the contract and contract negotiations between ENH and and ENH Medical Group United Healthcare; matters addressed in her investigational hearing; and other related topics.

PERSONS AFFILIATED WITH RESPONDENTS

1. Complaint Counsel reserves the right to call as witnesses individuals identified in Respondent's Initial Disclosures dated March 24, 2004, whom Respondents identified as "individuals who are likely to have discoverable information relevant to the allegations of the Commission's complaint, to the proposed relief, or to Respondents' defenses." This specifically includes, without limitation, the following individuals:
 - A. Theresa Chan
 - B. Dr. Joseph Golbus
 - C. Jeffrey Hillebrand
 - D. Jodi Levine
 - E. Homer Livingston
 - F. David Loveland
 - G. Ronald Spaeth
 - H. Jack Gilbert
 - I. Tom Hodges
 - J. Marsha Miller
 - K. Mark Neaman
 - L. Ken Herlin
 - M. Jon Kaplan
 - N. Chuck Farkas
 - O. Kim Ogden
 - P. Phyllis Yale

- Q. Bruce Spivey
- R. Heidi Schelling
- S. Michael Englehart
- T. Lou Porn

2. Michelle Mittleman – ENH Medical Group’s Network Development Manager. Ms. Mittleman may be called to testify about, without limitation, the operation of the ENH Medical Group, physician contracting, pricing, and related topics. (Ms.. Mittleman was not identified by Respondents as an employee of ENH is likely to have knowledge relevant to the allegations of the complaint, to the proposed relief, or to Respondents’ defenses.)
3. Complaint Counsel reserves the right to call as witnesses physicians on the medical staff of Highland Park Hospital who cannot be identified at this time.
4. Complaint Counsel reserves the right to call as witnesses physicians on the medical staff of Evanston Hospital or Glenbrook Hospital who cannot be identified at this time.
5. Complaint Counsel reserves the right to call as witnesses current or former employees of ENH, Faculty Practice Associates, Inc., ENH Medical Group, Inc. Lakeland Health Services, Inc., Highland Park Hospital and their related companies who cannot be identified at this time.

OTHER WITNESSES


1. Thomas Kuhlman, Towers Perrin – Mr. Kuhlman may be called to testify about a study of Towers Perrin evaluating costs for health care due, among other things, to the ENH-Highland Park merger.
2. Lois Laurie - Director of Benefits, HR Group, Abbott Laboratories – Ms. Laurie may be called to testify about Abbott’s negotiation of health care contracts with ENH and other hospitals and other related topics.
3. Elizabeth Shelley, Towers Perrin. Ms. Shelly may be called to testify about a study evaluating costs for health care due, among other things, to the ENH-Highland Park merger.
4. Complaint Counsel reserves the right to call one or more of the following third parties regarding the operation of their hospitals and other related topics.

- A. Mark Pelletier, COO, Holy Family and VP, Resurrection Health Care.
 - B. William Ries, President, Lake Forest Hospital
 - C. Sherlyn Hailstone, CEO, St. Francis Hospital
 - D. Peter Butler, President Rush North Shore
 - E. Gary Mecklenberg – Northwestern Memorial Hospital
5. Representatives of the State Health Facilities Planning Board – The proposed witness may be called to testify about the State of Illinois Certificate of Need law and process as it applies to the Evanston, Illinois area.
6. Complaint Counsel reserves the right to add names necessary for rebuttal; expert witnesses, and supplementary witnesses, and additional persons identified in the course of discovery as having information relevant to the Complaint or Respondents' Answer and Defenses. Complaint Counsel reserves the right not to call any of the persons listed herein to testify at trial, as circumstances may warrant.

Respectfully submitted,

Dated:

4/13/04


Thomas H. Brock, Esq.
Complaint Counsel

CERTIFICATE OF SERVICE

This is to certify that on 4/13, 2004, 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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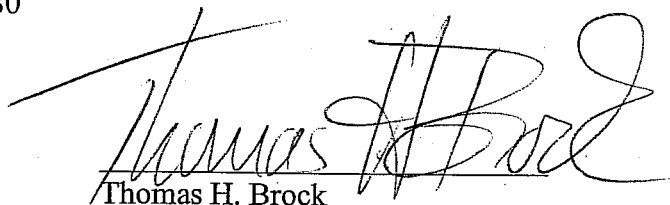
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and delivery of two copies to:

The Honorable Stephen J. McGuire
Federal Trade Commission
600 Pennsylvania Avenue
Room 113
Washington, DC 20580

4/13/04

Date


Thomas H. Brock
Complaint Counsel