

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

In the matter of)	
)	
Evanston Northwestern Healthcare Corporation,)	Docket No. 9315
a corporation, and)	Public Record Version
)	
ENH Medical Group, Inc.,)	
a corporation.)	

**RESPONDENTS' FIRST AMENDED ANSWERS AND OBJECTIONS TO
COMPLAINT COUNSEL'S FIRST SET OF INTERROGATORIES**

Pursuant to the Federal Trade Commission's Rules of Practice ("Rules"), 16 C.F.R. § 3.31(e)(2), Respondents Evanston Northwestern Healthcare Corporation ("ENH") and ENH Medical Group, Inc. ("ENH Medical Group") (collectively, "Respondents"), by counsel, hereby supplement their answers to Complaint Counsel's First Set of Interrogatories as follows:

5. Identify all contracts relating to the provision of medical services negotiated or entered into by the Northwestern Healthcare Network and, for each such contract, set forth the total dollar volume of sales by Respondent Hospitals pursuant to the contract for each year from 1989 through 2001.

Answer: Respondents object to this interrogatory on the grounds that it is overbroad and unduly burdensome. Respondents further object on the ground that the burden of deriving or ascertaining the answer to this interrogatory is substantially the same for Complaint Counsel as for Respondents. *See* 16 C.F.R. § 3.35(c).

Notwithstanding and subject to these objections and the General Objections listed in Respondents' Answers, Respondents state that ENH had, to the best of its knowledge, the following contracts through The Northwestern Healthcare Network (the "Network"):

[REDACTED]

34. Identify each instance in which the Evanston Healthcare Network terminated the employment of a person employed by Respondent Hospital(s) and, in each such instance, identify the grounds for the termination.

ANSWER: Respondents object to this interrogatory on the grounds that it is overbroad and unduly burdensome. Respondents also object on the ground that this interrogatory cannot reasonably be expected to yield information relevant to the allegations of the Complaint, to the proposed relief, or to the defenses of Respondents. Respondents further object on the ground that the burden of deriving or ascertaining the answer to this interrogatory is substantially the same for Complaint Counsel as for Respondents. *See* 16 C.F.R. § 3.35©.

Notwithstanding and subject to these objections and the General Objections listed in Respondents' Answers, Respondents state that no entity with the name "Evanston Healthcare Network" exists, or has ever existed in relationship to the parties or matters raised in this proceeding.

[REDACTED]

[REDACTED]

35. Identify each instance in which Respondent Hospital(s) deferred or decided to forego capital or operational expenditures because those expenditures were not approved by Evanston Healthcare Network.

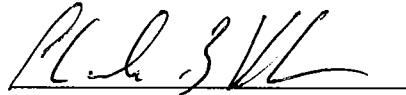
Answer: Respondents object to this interrogatory on the grounds that it is overbroad, unduly burdensome, ambiguous, and vague. Respondents also object on the ground that the burden of deriving or ascertaining the answer to this interrogatory is substantially the same for Complaint Counsel as for Respondents. *See* 16 C.F.R. § 3.35©.

Notwithstanding and subject to these objections and the General Objections listed in Respondents' Answers, Respondents state that, as described in the response to Interrogatory 34 above,

[REDACTED]

[REDACTED]

Respectfully Submitted,



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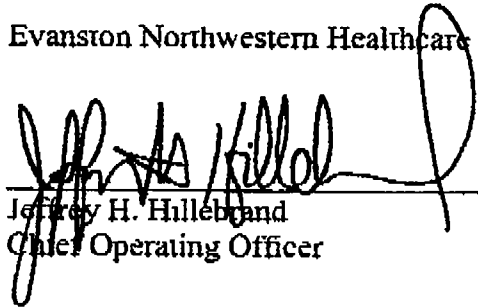
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Counsel for Respondents

VERIFICATION

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and recollection. Executed on this 19th day of November 2004.

Evanston Northwestern Healthcare Corporation



Jeffrey H. Hillebrand
Chief Operating Officer

CERTIFICATE OF SERVICE

I hereby certify that on November 19, 2004, a copy of the foregoing *Respondents' First Amended Answers and Objections to Complaint Counsel's First Set of Interrogatories* was served by email and first class mail, postage prepaid, on:

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