

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

In the Matter of))) Evanston Northwestern Healthcare) Corporation,) a corporation, and)) ENH Medical Group, Inc.,) a corporation.)		Docket No. 9315 Public Filing
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AFFIDAVIT OF MICHAEL ABBENE

I, Michael Abbene, being first duly sworn, hereby state the following under oath, based on my personal knowledge:

1. I am the Regional Sales Vice-President of Great-West Life & Annuity Insurance Company.

2. I have reviewed the subpoena served upon Great-West Healthcare of Illinois, Inc. in this matter by Evanston Northwestern Healthcare Corporation and ENH Medical Group, Inc., concentrating on paragraphs 3, 5, 6, 22, 23, 24, 25, 27, 29, 38 and 39. I have made a determination as to the costs, the number of individuals and the total employee hours involved in responding to said paragraphs by the division for which I am responsible as set forth hereafter.

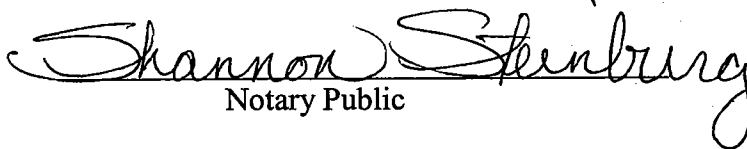
3. Some of the documents described in paragraphs 3, 5, 6, 22, 23, 24, 25, 27, 29, 38 and 39 of the subpoena would be contained in proposals made by the division for which I am responsible. That division makes approximately 500 proposals per year and maintains them in its records for one year. To obtain and copy the proposals made in 2003 and 2004 to date would require the full time efforts of a current employee and the full time efforts of a temporary

employee for one month, or approximately 176 hours for each. The average hourly wage/salary for the current employee would approximate \$ 19.00. The average hourly cost for the temporary employee would approximate \$ 15.00. The total wage/salary/cost would approximate \$6,000, and I cannot estimate the copying costs.



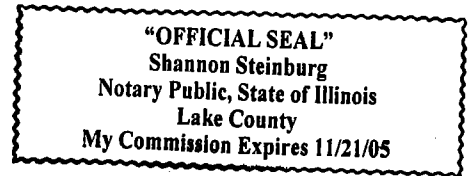
Michael Abbene

Subscribed and sworn to before me this
1st day of June 2004.



Notary Public

My Commission Expires: 11-21-05



Richard G. Schultz (rschultz@scgk.com)
Franklin S. Schwerin (fschwerin@scgk.com)
Schwartz, Cooper, Greenberger & Krauss, Chtd.
180 North LaSalle Street, Suite 2700
Chicago, IL 60601
Phone: (312) 346-1300
Fax: (312) 782-8146

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Evanston Northwestern Healthcare Corporation,)	Docket No. 9315
a corporation, and)	
)	
ENH Medical Group, Inc.,)	Public Filing
a corporation.)	
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AFFIDAVIT OF DIANA N. BLUH

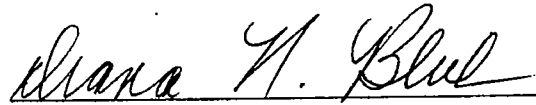
I, Diana N. Bluh, being first duly sworn, hereby state the following under oath, based on my personal knowledge:

1. I am an Account Associate in the Sales Department with Great-West Life & Annuity Insurance Company.

2. I have reviewed the subpoena served upon Great-West Healthcare of Illinois, Inc. in this matter by Evanston Northwestern Healthcare Corporation and ENH Medical Group, Inc., concentrating on paragraphs 23 and 24. I have made a determination as to the costs, the number of individuals and the total employee hours involved in responding to said paragraphs by the division for which I am responsible as set forth hereafter.

3. Some of the documents described in paragraphs 23 and 24 of the subpoena would be contained in proposals made by the division for which I am responsible. That division makes approximately 500 proposals per year and maintains them in its records for one year. However, if a group elects to contract with Great-West, those proposals are maintained for the life of the contract. It would require the full time efforts of a current employee and the part time efforts of

another employee approximately 60 hours to review and produce the same. (40 hours for one employee and 20 hours for another) The average hourly wage/salary for the employees would approximate \$22.50. The total wage/salary/cost would approximate \$1,350. Further, we maintain our proposals at off-site storage. To retrieve a box, we are charged \$5 per box and another \$5 to return and restock. The number of boxes is not determinable at this time. I cannot estimate the copying costs.


Diana N. Bluh

Subscribed and sworn to before me this
3RD day of June, 2004.


Notary Public

My Commission Expires:

Notary Public, Cobb County, Georgia
My Commission Expires Dec. 19, 2007

Richard G. Schultz (rschultz@scgk.com)
Franklin S. Schwerin (fschwerin@scgk.com)
Schwartz, Cooper, Greenberger & Krauss, Chtd.
180 North LaSalle Street, Suite 2700
Chicago, IL 60601
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AFFIDAVIT OF LORI EARNEST

I, Lori Earnest, being first duly sworn, hereby state the following under oath, based on my personal knowledge:

1. I am a Technical Manager in the Integration and Information Data Services Department of Great-West Life & Annuity Insurance Company, have worked in this capacity for the past seven (7) years and have personal knowledge regarding Great-West's data warehouse, data marts and operational data store.

2. I have reviewed the subpoena served upon Great-West Healthcare of Illinois, Inc. in this matter by Evanston Northwestern Healthcare Corporation and ENH Medical Group, Inc., concentrating on paragraphs 7, 11, 12 and 13 of the subpoena. I have made a determination as to the feasibility, costs, number of individuals and the total employee hours involved in responding to said paragraphs by the division for which I am responsible.

3. The information and data requested in paragraphs 7, 11, 12 and 13 of the subpoena, to the extent available, would be obtained principally from One Source, a data warehouse. Such information and data would be on the Denver platform and the St. Louis

platform. Denver platform claim data is available from 1998 to the present. St. Louis platform claim data is available from August 1999 to the present.

4. Many of the specific requests are not available. For example, “admitting physician” is not available through a computer search; the facility name is on the claim record, but not the admitting physician. Thus, identification of physician groups or organizations is not available. Further, the ZIP codes input on the system are the billing entities' ZIP codes, which would not necessarily be the ZIP codes of the physician groups or organizations.

5. Without running specific queries, I am unable to determine what information can be gleaned from the system. To respond to the requests set forth in paragraphs 7, 11, 12 and 13 of the subpoena, without individually running the 75,000 members' claims history, would require a computer programmer to write SQL code to create multiple queries to be run against the warehouse database tables.

6. To search for the documents described in paragraphs 7, 11, 12 and 13 of the subpoena would require at least 120 full time employee hours at one of our programmers' hourly rates of \$65.50 (\$7,680). Copying charges are not determinable at this time.

Lori Earnest
Lori Earnest

Subscribed and sworn to before me this
27th day of May, 2004.

Alice M. Ahern
Notary Public

My Commission Expires: 9-2-2007



Richard G. Schultz (rschultz@scgk.com)
Franklin S. Schwerin (fschwerin@scgk.com)
Schwartz, Cooper, Greenberger & Krauss, Chtd.
180 North LaSalle Street, Suite 2700
Chicago, IL 60601
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AFFIDAVIT OF DAVID LIVINGSTON

I, David Livingston, being first duly sworn, hereby state the following under oath, based on my personal knowledge:

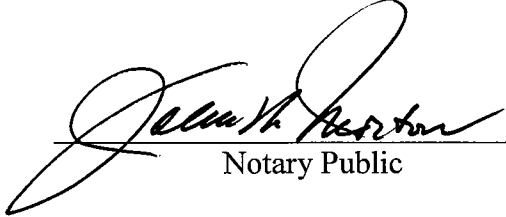
1. I am employed by Great-West Life & Annuity Insurance Company in the Healthcare Management Department.
2. I have reviewed the subpoena served upon Great-West Healthcare of Illinois, Inc. in this matter by Evanston Northwestern Healthcare Corporation and ENH Medical Group, Inc., concentrating on paragraphs 2, 5, 6, 11, 12, 13, 15, 28 and 35. I have made a determination as to the costs and the number of individuals involved in responding to said paragraphs by the Healthcare Management Department as set forth hereafter.
3. To obtain and copy the documents required of the Healthcare Management Department with respect to paragraphs 2, 5, 6, 11, 12, 13, 15, 28 and 35 of the subpoena would require the full time efforts of a current employee and the full time efforts of a temporary employee working for three months, or approximately 538 hours for each. The average hourly wage/salary for the current employee would approximate \$35.00. The average hourly cost for

the temporary employee would approximate \$20.00. The total wage/salary/cost would approximate \$23,000. Copying costs cannot be estimated at this time.



David Livingston

Subscribed and sworn to before me this
25th day of May, 2004.



Notary Public

My Commission Expires:

Aug. 23, 2005

Richard G. Schultz (rschultz@scgk.com)
Franklin S. Schwerin (fschwerin@scgk.com)
Schwartz, Cooper, Greenberger & Krauss, Chtd.
180 North LaSalle Street, Suite 2700
Chicago, IL 60601
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Docket No. 9315

Public Filing

AFFIDAVIT OF WILLIAM PATTEN

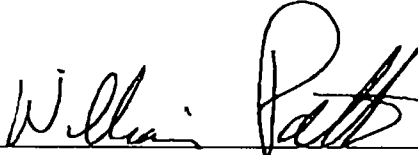
I, William Patten, being first duly sworn, hereby state the following under oath, based on my personal knowledge:

1. I am the Vice President of Network Management of Great-West Life & Annuity Insurance Company.

2. I have reviewed the subpoena served upon Great-West Healthcare of Illinois, Inc. in this matter by Evanston Northwestern Healthcare Corporation and ENH Medical Group, Inc., concentrating on paragraphs 1, 3, 4, 5, 8, 9, 17, 18, 19, 20, 21, 28, 29, 30, 31, 32, 38, 39, 40, 41 and 43. I have made a determination as to the costs, the number of individuals and the total employee hours involved in responding to said paragraphs by the Midwest Region as set forth hereafter.

3. To obtain and copy the documents described in 1, 3, 4, 5, 8, 9, 17, 18, 19, 20, 21, 28, 29, 30, 31, 32, 38, 39, 40, 41 and 43 of the subpoena would require the full time efforts of 1-2 current employees and a temporary employee for a period of 2-3 months, or approximately 352-538 hours for each. The average hourly wage/salary for the current employees would

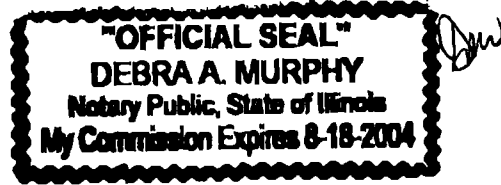
approximate \$31.25. The average hourly cost for the temporary employee would approximate \$31.25. The total wage/salary/cost would approximate \$14,000, and the copying costs would approximate \$11,200.


William Patten

Subscribed and sworn to before me this 27th day of May, 2004.


Notary Public

My Commission Expires: 8/18/04



Richard G. Schultz (rschultz@scgk.com)
Franklin S. Schwerin (fschwerin@scgk.com)
Schwartz, Cooper, Greenberger & Krauss, Chtd.
180 North LaSalle Street, Suite 2700
Chicago, IL 60601
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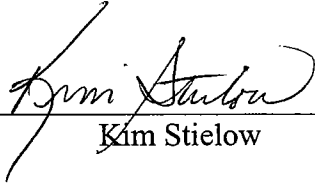
AFFIDAVIT OF KIM STIELOW

I, Kim Stielow, being first duly sworn, hereby state the following under oath, based on my personal knowledge:

1. I am employed by Great-West Life & Annuity Insurance Company in the Products/Marketing Department.
2. I have reviewed the subpoena served upon Great-West Healthcare of Illinois, Inc. in this matter by Evanston Northwestern Healthcare Corporation and ENH Medical Group, Inc., concentrating on paragraphs 5, 17, 22 and 39. I have made a determination as to the costs and the number of individuals involved in responding to said paragraphs by the Products/Marketing Department as set forth hereafter.
3. To obtain and copy the documents required of the Products/Marketing Department with respect to paragraphs 5, 17, 22 and 39 of the subpoena would require 40 to 60 current employee hours. The average hourly wage/salary (including benefits) would range from \$20- \$50 per hour with overall estimated wage/salary costs of \$2,000. Copying costs are not determinable at this time.

AFFIDAVIT OF KIM STIELOW

PAGE 2



Kim Stielow

Subscribed and sworn to before me this
27 day of May, 2004.



Notary Public



My Commission Expires: 9-2-2007

Richard G. Schultz (rschultz@scgk.com)
Franklin S. Schwerin (fschwerin@scgk.com)
Schwartz, Cooper, Greenberger & Krauss, Chtd.
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Chicago, IL 60601
Phone: (312) 346-1300
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