

**UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION**

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

**COMPLAINT COUNSEL’S SEVENTH REQUEST FOR ADMISSIONS
CONCERNING AUTHENTICITY AND ADMISSIBILITY**

Pursuant to the Federal Trade Commission (“FTC”) Rules of Practice for Adjudicative Proceedings § 3.32, complaint counsel submit these requests for admissions to respondents Evanston Northwestern Healthcare Corporation and ENH Medical Group, Inc.

Definitions

1. “Evanston Northwestern Healthcare” means Evanston Northwestern Healthcare Corporation, including its past or surviving parents, subsidiaries and affiliates (including Evanston Hospital Corporation, Evanston Hospital, Glenbrook Hospital, and, beginning on January 1, 2000, Highland Park Hospital), a corporation organized, existing, and doing business under and by virtue of the

laws of the State of Illinois, with its principal place of business located at 1301 Central Street, Evanston, Illinois 60201.

2. “Highland Park” means Highland Park Hospital, including its past or surviving parents, subsidiaries and affiliates, a hospital located near Evanston, Illinois.
3. “[REDACTED]” means [REDACTED], including its past or surviving parents, subsidiaries, and affiliates (including [REDACTED]).
4. “Business Record” as defined according to Rule 803(6) of the Federal Rules of Evidence is “[a] memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses, made at or near the time by, or from information transmitted by, a person with knowledge, if kept in the course of a regularly conducted business activity, [where] it was the regular practice of that business activity to make the memorandum, report, record or data compilation....”

REQUESTS FOR ADMISSIONS

[REDACTED]

Highland Park Hospital

[REDACTED]

1631. The document attached to this Request for Admissions as Exhibit CX-05136 is authentic,

genuine, and a true and correct copy of a contract (plus a cover letter) between [REDACTED] and Highland Park, effective [REDACTED]. [REDACTED] contract is a business record of one or both contracting parties. The contract is admissible into evidence in this matter.

1632. The document attached to this Request for Admissions as Exhibit CX-05137 is authentic, genuine, and a true and correct copy of a consent to assignment, effective on or about [REDACTED]. The consent to assignment is a business record of one or both parties to the consent to assignment. The consent to assignment is admissible into evidence in this matter.

1633. The document attached to this Request for Admissions as Exhibit CX-05138 is authentic, genuine, and a true and correct copy of a notice of assignment, effective on or about [REDACTED]. The notice of assignment is a business record of one or both parties to the notice of assignment. The notice of assignment is admissible into evidence in this matter.

1634. The document attached to this Request for Admissions as Exhibit CX-05139 is authentic, genuine, and a true and correct copy of a notice of termination, effective [REDACTED]. The notice of termination is a business record of one or both parties to the notice of termination. The notice of termination is admissible into evidence in this matter.

1635. Exhibit CX-05136 constitutes an authentic, genuine, true and correct copy of the complete set of [REDACTED] contracts and amendments (plus a cover letter) between [REDACTED] and Highland Park from [REDACTED]. This set of an exhibit is admissible into evidence in this matter.

1636. Exhibits CX-05137 through CX-05138 constitute an authentic, genuine, true and correct copy of the complete set of [REDACTED] assignments between [REDACTED] and Highland Park from [REDACTED]. This set of exhibits is admissible into evidence in this matter.

1637. Exhibit CX-05139 constitutes an authentic, genuine, true and correct copy of the complete set of the [REDACTED] notices of termination between [REDACTED] and Highland Park from [REDACTED]. This set of an exhibit is admissible into evidence in this matter.

[REDACTED]

1638. The document attached to this Request for Admissions as Exhibit CX-05140 is authentic, genuine, and a true and correct copy of a contract between [REDACTED] and Highland Park, effective [REDACTED]. The [REDACTED] contract is a business record of one or both contracting parties. The contract is admissible into evidence in this matter.

1639. The document attached to this Request for Admissions as Exhibit CX-05141 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05140. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.

1640. The document attached to this Request for Admissions as Exhibit CX-05138 is authentic, genuine, and a true and correct copy of a notice of assignment, effective on or about [REDACTED]. The notice of assignment is a business record of one or both parties to the notice of assignment. The notice of assignment is admissible into evidence in this

matter.

1641. The document attached to this Request for Admissions as Exhibit CX-05139 is authentic, genuine, and a true and correct copy of a notice of termination, effective [REDACTED]. The notice of termination is a business record of one or both parties to the notice of termination. The notice of termination is admissible into evidence in this matter.
1642. Exhibits CX-05140 through CX-05141 constitute an authentic, genuine, true and correct copy of the complete set of the [REDACTED] contracts and amendments between [REDACTED] and Highland Park from [REDACTED]. This set of exhibits is admissible into evidence in this matter.
1643. Exhibit CX-05138 constitutes an authentic, genuine, true and correct copy of the complete set of the [REDACTED] notices of assignment between [REDACTED] and Highland Park from [REDACTED]. This set of an exhibit is admissible into evidence in this matter.
1644. Exhibit CX-05139 constitutes an authentic, genuine, true and correct copy of the complete set of the [REDACTED] notices of termination between [REDACTED] and Highland Park from [REDACTED]. This set of an exhibit is admissible into evidence in this matter.

[REDACTED]

1645. The document attached to this Request for Admissions as Exhibit CX-05142 is authentic, genuine, and a true and correct copy of a contract between [REDACTED] and Highland Park, effective [REDACTED]. The [REDACTED] contract is a business record of one or both contracting parties. The contract is admissible

into evidence in this matter.

1646. The document attached to this Request for Admissions as Exhibit CX-05143 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05142. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1647. The document attached to this Request for Admissions as Exhibit CX-05138 is authentic, genuine, and a true and correct copy of a notice of assignment, effective [REDACTED]. The notice of assignment is a business record of one or both parties to the notice of assignment. The notice of assignment is admissible into evidence in this matter.
1648. The document attached to this Request for Admissions as Exhibit CX-05139 is authentic, genuine, and a true and correct copy of a notice of termination, effective [REDACTED]. The notice of termination is a business record of one or both parties to the notice of termination. The notice of termination is admissible into evidence in this matter.
1649. Exhibits CX-05142 through CX-05143 constitute an authentic, genuine, true and correct copy of the complete set of the [REDACTED] contracts and amendments between [REDACTED] and Highland Park from [REDACTED]. This set of exhibits is admissible into evidence in this matter.
1650. Exhibit CX-05138 constitutes an authentic, genuine, true and correct copy of the complete set of the [REDACTED] notices of assignment between [REDACTED] and Highland Park from [REDACTED]. This set of an exhibit is admissible into evidence in this matter.

1651. Exhibit CX-05139 constitutes an authentic, genuine, true and correct copy of the complete set of the [REDACTED] notices of termination between [REDACTED] and Highland Park from [REDACTED]. This set of an exhibit is admissible into evidence in this matter.

[REDACTED]

1652. The document attached to this Request for Admissions as Exhibit CX-05144 is authentic, genuine, and a true and correct copy of a contract between [REDACTED] and Highland Park, entered into [REDACTED]. The [REDACTED] contract is a business record of one or both contracting parties. The contract is admissible into evidence in this matter.

1653. The document attached to this Request for Admissions as Exhibit CX-05145 is authentic, genuine, and a true and correct copy of an amendment (plus a cover letter), effective [REDACTED], to CX-05144. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.

1654. The document attached to this Request for Admissions as Exhibit CX-05146 is authentic, genuine, and a true and correct copy of an amendment (plus a cover letter), effective [REDACTED], to CX-05144. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.

1655. The document attached to this Request for Admissions as Exhibit CX-05147 is authentic, genuine, and a true and correct copy of an amendment (plus a cover memorandum and a letter), effective [REDACTED], to CX-05144. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this

matter.

1656. Exhibits CX-05144 through CX-05147 constitute an authentic, genuine, true and correct copy of the complete set of the [REDACTED] contracts and amendments (plus a cover memorandum and three letters) between [REDACTED] and Highland Park (except for contracts in which the named contracting parties include [REDACTED]) from [REDACTED]. This set of exhibits is admissible into evidence in this matter.

[REDACTED]

1657. The document attached to this Request for Admissions as Exhibit CX-05148 is authentic, genuine, and a true and correct copy of a contract (including an amendment effective the same date) between [REDACTED] and Highland Park, effective [REDACTED]. The [REDACTED] contract is a business record of one or both contracting parties. The contract is admissible into evidence in this matter.

1658. Exhibit CX-05148 constitutes an authentic, genuine, true and correct copy of the complete set of the [REDACTED] contracts and amendments between [REDACTED] and Highland Park from [REDACTED]. This set of an exhibit is admissible into evidence in this matter.

[REDACTED]

1659. The document attached to this Request for Admissions as Exhibit CX-05149 is authentic, genuine, and a true and correct copy of a [REDACTED] amendment (plus a cover letter and a [REDACTED])

[REDACTED] memorandum), effective [REDACTED], to CX-05148. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.

1660. The document attached to this Request for Admissions as Exhibit CX-05150 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05148. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.

1661. The document attached to this Request for Admissions as Exhibit CX-05151 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05148. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.

1662. Exhibits CX-05148 through CX-05151 constitute an authentic, genuine, true and correct copy of the complete set of the contracts and amendments (plus a cover letter and a memorandum) between [REDACTED] and Highland Park from [REDACTED]. This set of exhibits is admissible into evidence in this matter.

Evanston Northwestern Healthcare

[REDACTED]

1663. The document attached to this Request for Admissions as Exhibit CX-05152 is authentic, genuine, and a true and correct copy of a contract between [REDACTED] and Evanston Northwestern Healthcare, effective [REDACTED]. The [REDACTED] contract is a business record of one or both contracting parties.

The contract is admissible into evidence in this matter.

1664. The document attached to this Request for Admissions as Exhibit CX-05153 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05152. The amendment is a business record of one or both parties to the amendment.

The amendment is admissible into evidence in this matter.

1665. The document attached to this Request for Admissions as Exhibit CX-05154 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05152. The amendment is a business record of one or both parties to the amendment.

The amendment is admissible into evidence in this matter.

1666. Exhibits CX-05152 through CX-05154 constitute an authentic, genuine, true and correct copy of the complete set of the contracts and amendments between [REDACTED] and Evanston Northwestern Healthcare from [REDACTED]. This set of exhibits is admissible into evidence in this matter.

[REDACTED]

1667. The document attached to this Request for Admissions as Exhibit CX-05155 is authentic, genuine, and a true and correct copy of a contract (plus a cover letter) between [REDACTED] and Evanston Northwestern Healthcare, effective [REDACTED]. The [REDACTED] contract is a business record of one or both contracting parties. The contract is admissible into evidence in this matter.

1668. The document attached to this Request for Admissions as Exhibit CX-05156 is authentic, genuine, and a true and correct copy of an amendment, signed [REDACTED], to CX-05155. The amendment is a business record of one or both parties

to the amendment. The amendment is admissible into evidence in this matter.

1669. The document attached to this Request for Admissions as Exhibit CX-05157 is authentic, genuine, and a true and correct copy of an amendment (plus a cover letter), effective [REDACTED], to CX-05155. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.

1670. The document attached to this Request for Admissions as Exhibit CX-05158 is authentic, genuine, and a true and correct copy of an amendment, effective [REDACTED], to CX-05155. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.

1671. Exhibits CX-05155 through CX-05158 constitute an authentic, genuine, true and correct copy of the complete set of the contracts and amendments (plus two cover letters) between [REDACTED] and Evanston Northwestern Healthcare from [REDACTED]. This set of exhibits is admissible into evidence in this matter.

[REDACTED]

1672. The document attached to this Request for Admissions as Exhibit CX-05159 is authentic, genuine, and a true and correct copy of a [REDACTED] amendment (plus a cover letter), effective [REDACTED]. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.

1673. The document attached to this Request for Admissions as Exhibit CX-05160 is authentic, genuine, and a true and correct copy of a [REDACTED] amendment (plus a cover letter), effective [REDACTED]. The amendment is a business record of one or both parties to the

amendment. The amendment is admissible into evidence in this matter.

1674. The document attached to this Request for Admissions as Exhibit CX-05161 is authentic, genuine, and a true and correct copy of a [REDACTED] amendment, dated [REDACTED]. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1675. The document attached to this Request for Admissions as Exhibit CX-05162 is authentic, genuine, and a true and correct copy of a [REDACTED] amendment (plus a cover letter), dated [REDACTED]. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1676. The document attached to this Request for Admissions as Exhibit CX-05163 is authentic, genuine, and a true and correct copy of a [REDACTED] amendment (plus a cover memorandum), effective [REDACTED]. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1677. The document attached to this Request for Admissions as Exhibit CX-05164 is authentic, genuine, and a true and correct copy of a [REDACTED] amendment (plus a cover letter), dated [REDACTED]. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1678. The document attached to this Request for Admissions as Exhibit CX-05165 is authentic, genuine, and a true and correct copy of a [REDACTED] amendment (plus other related papers), dated [REDACTED]. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.

1679. The document attached to this Request for Admissions as Exhibit CX-05166 is authentic, genuine, and a true and correct copy of a [REDACTED] amendment, effective [REDACTED]. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1680. The document attached to this Request for Admissions as Exhibit CX-05167 is authentic, genuine, and a true and correct copy of a [REDACTED] amendment, effective [REDACTED]. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1681. Exhibits CX-05159 through CX-05167 constitute an authentic, genuine, true and correct copy of the complete set of the contracts and amendments (plus four cover letters, a cover memorandum, and other related papers) between [REDACTED] and Evanston Northwestern Healthcare from [REDACTED]. This set of exhibits is admissible into evidence in this matter.

[REDACTED]

1682. The document attached to this Request for Admissions as Exhibit CX-05168 is authentic, genuine, and a true and correct copy of a contract (plus a cover letter) between [REDACTED] and Evanston Northwestern Healthcare, effective [REDACTED]. The contract is a business record of one or both contracting parties. The contract is admissible into evidence in this matter.

1683. The document attached to this Request for Admissions as Exhibit CX-05169 is authentic, genuine, and a true and correct copy of an amendment (plus a cover memorandum and other related papers), executed [REDACTED], to CX-05168. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1684. The document attached to this Request for Admissions as Exhibit CX-05163 is authentic, genuine, and a true and correct copy of a [REDACTED] amendment (plus a cover memorandum), effective [REDACTED]. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1685. The document attached to this Request for Admissions as Exhibit CX-05170 is authentic, genuine, and a true and correct copy of an amendment (plus a cover letter), effective [REDACTED], to CX-05168. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1686. The document attached to this Request for Admissions as Exhibit CX-05171 is authentic, genuine, and a true and correct copy of a [REDACTED] amendment, effective [REDACTED], to CX-05168. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1687. The document attached to this Request for Admissions as Exhibit CX-05172 is authentic, genuine, and a true and correct copy of a [REDACTED] amendment, effective [REDACTED], to CX-05168. The

amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.

1688. Exhibits CX-05168 through CX-05172 and CX-05163 constitute an authentic, genuine, true and correct copy of the complete set of the contracts and amendments (plus two cover letters, two cover memoranda, and other related papers) between [REDACTED] and Evanston Northwestern Healthcare from [REDACTED]. This set of exhibits is admissible into evidence in this matter.

[REDACTED]

1689. The document attached to this Request for Admissions as Exhibit CX-05166 is authentic, genuine, and a true and correct copy of a [REDACTED] amendment, effective [REDACTED]. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1690. The document attached to this Request for Admissions as Exhibit CX-05171 is authentic, genuine, and a true and correct copy of a [REDACTED] amendment, effective [REDACTED], to CX-05168. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1691. The document attached to this Request for Admissions as Exhibit CX-05167 is authentic, genuine, and a true and correct copy of a [REDACTED] amendment, effective [REDACTED]. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into

evidence in this matter.

1692. The document attached to this Request for Admissions as Exhibit CX-05172 is authentic, genuine, and a true and correct copy of a [REDACTED] amendment, [REDACTED], to CX-05168. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1693. The document attached to this Request for Admissions as Exhibit CX-05173 is authentic, genuine, and a true and correct copy of an amendment (plus a cover letter), effective [REDACTED], to CX-05168. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.
1694. Exhibits CX-05166 through CX-05167 and CX-05171 through CX-05173 constitute an authentic, genuine, true and correct copy of the complete set of the [REDACTED] contracts and amendments (plus a cover letter) between [REDACTED]. and Evanston Northwestern Healthcare from [REDACTED]. This set of exhibits is admissible into evidence in this matter.
1695. The document attached to this Request for Admissions as Exhibit CX-05174 is authentic, genuine, and a true and correct copy of a contract (plus a cover letter) between [REDACTED] and Evanston Northwestern Healthcare, effective [REDACTED]. The contract is a business record of one or both contracting parties. The contract is admissible into evidence in this matter.
1696. The document attached to this Request for Admissions as Exhibit CX-05175 is authentic, genuine, and a true and correct copy of an amendment (plus a cover letter), effective [REDACTED],

to CX-05174. The amendment is a business record of one or both parties to the amendment. The amendment is admissible into evidence in this matter.

1697. Exhibits CX-05174 through CX-05175 constitute an authentic, genuine, true and correct copy of the complete set of the contracts and amendments (plus two cover letters) between [REDACTED] and Evanston Northwestern Healthcare from [REDACTED]. This set of exhibits is admissible into evidence in this matter.

1698. The document attached to this Request for Admissions as Exhibit CX-05176 is authentic, genuine, and a true and correct copy of a contract between [REDACTED] and Evanston Northwestern Healthcare, effective [REDACTED]. The contract is a business record of one or both contracting parties. The contract is admissible into evidence in this matter.

1699. Exhibits CX-05174 through CX-05176 constitute an authentic, genuine, true and correct copy of the complete set of the contracts and amendments (plus two cover letters) between [REDACTED] and Evanston Northwestern Healthcare from [REDACTED]. This set of exhibits is admissible into evidence in this matter.

Attachments

Thomas Brock
Philip Eisenstat
Paul Nolan
Renée Henning
Nancy Park
Counsel Supporting the Complaint
Bureau of Competition

Federal Trade Commission
Washington, D.C. 20580
Telephone (202) 326-2813
Facsimile (202) 326-2884

Dated: _____, 2004

CERTIFICATE OF SERVICE

This is to certify that on _____, 2004, I caused a copy of the foregoing to be served upon counsel for the respondents by electronic mail and first class mail delivery:

Michael Sibarium, Esquire
WINSTON & STRAWN
1400 L Street, N.W.
Washington, D.C. 20005

Charles Klein, Esquire
WINSTON & STRAWN
1400 L Street, N.W.
Washington, D.C. 20005

Duane Kelley, Esquire
WINSTON & STRAWN
35 West Wacker Drive
Chicago, IL 60601

Michael T. Hannafan
Michael T. Hannafan & Associates, Ltd.
One East Wacker Drive
Suite 1208
Chicago, IL 60601

and delivery of two copies to:

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

Thomas Brock