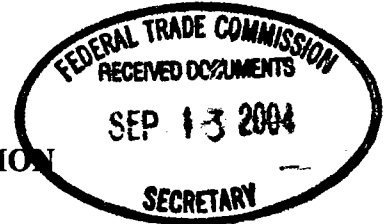


UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION



_____)
In the matter of)
)
Evanston Northwestern Healthcare Corp.,) Docket No. 9315
a corporation, and)
)
ENH Medical Group, Inc.,)
a corporation.)
_____)

CORRECTED STATEMENT OF THOMAS M. CRISHAM

I, Thomas M. Crisham, do hereby state as follows:

1. Pursuant to FTC Rule of Practice 3.22(f), I have had several conferences with counsel for the Respondents in a good-faith effort to reach an agreement as to the scope of documents requested in the Subpoenas *Duces Tecum* served upon Abbott Laboratories and Towers Perrin as follows:

August 8, 2004 – Telephone conversation between myself and Michael T. Hannafan;
August 9, 2004 – In person meeting between myself and Michael T. Hannafan and Nick Pavich; and
August 30, 2004 – Telephone conversation between myself and Michael T. Hannafan.

2. Although an agreement was reached as to certain categories of the subpoenas, the parties have not been able to reach an agreement as to the following:

- A. All documents, reports, studies, surveys, or audits referring or relating in any manner to the ENH/Highland Park transaction.
- B. All documents prepared by or for Your Company assessing, analyzing, reporting, or comparing prices for healthcare services at ENH or Highland Park and any other health care facility.
- C. All documents which describe, compare, or evaluate the health care services, the quality of services, the cost of services, the staff, or the facilities of hospitals in the Geographic Area, including, but not limited to, ENH.

- D. All documents, information, materials and statistics used, cited, or relied upon in the preparation or drafting of the "Health Care Cost Drill Down" reports by Towers Perrin dated in November and December 2001 and distributed to Abbott Laboratories.
- E. All documents relating to competition in the provision of any health care service in the Geographic Area, including, but not limited to, market studies, forecasts, and surveys, and all other documents relating to:
- (1) the quality of care provided by any hospital;
 - (2) the relative strength or weakness of hospitals providing any health care service;
 - (3) hospital preferences or perceptions of consumers, patients, or physicians (including but not limited to, patient satisfaction surveys);
 - (4) the preferences of third party payors for hospitals;
 - (5) any comparisons of any hospital's contracted hospital rates with another hospital's rates.
- F. All documents describing or evaluating the ability to shift patients from one healthcare facility to another, or to encourage or discourage patients to use one hospital more than another.

I declare that the following statements are true and correct to the best of my knowledge, information and belief.



Thomas M. Crisham

CERTIFICATE OF SERVICE

I hereby certify that on September 8, 2004, a copy of the above and foregoing **CORRECTED STATEMENT OF THOMAS M. CRISHAM** was served via U.S. Mail on:

The Honorable Stephen J. McGuire
Chief Administrative Law Judge
Federal Trade Commission
600 Pennsylvania Avenue N.W. (H1-106)
Washington, DC 20580

Philip M. Eisenstat, Esq.
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Federal Trade Commission
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and served on counsel for the Respondents via U.S. Mail to:

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9/8/2004

Date



David J. Sullivan