

ORIGINAL



**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

**THIRD PARTY MOTION TO EXTEND TIME
IN WHICH TO MOVE TO OBTAIN *IN CAMERA* TREATMENT**

Great-West Healthcare of Illinois, Inc. ("Great-West Healthcare") hereby moves to extend the time, to and including January 11, 2005, in which it may move to obtain *in camera* treatment for material, or portions thereof, offered by Respondents, Evanston Northwestern Healthcare Corporation and ENH Medical Group, Inc. (collectively "Respondents"). In support thereof Great-West Healthcare states the following:

1. Respondents have informed Great-West Healthcare that they intend to offer into evidence 33 documents produced by Great-West Healthcare. Some of such documents contain schedules of reimbursement amounts which Great-West Healthcare currently pays to health care providers and other materials containing secret, competitively sensitive material, the disclosure of which would cause serious competitive injury to Great-West Healthcare

2. Great-West Healthcare intends to move to obtain *in camera* treatment for a limited number of such documents or limited portions of other documents in accordance with the standards for such treatment set forth in Section 3.45 of the Rules of Practice for Adjudicative Proceedings and decisions of the Commission.

3. Pursuant to the Third Revised Scheduling Order dated October 12, 2004, the deadline for filing motions for *in camera* treatment is January 4, 2005.

4. In order to determine which documents or portions thereof comply with the standards for *in camera* treatment set forth in Section 3.45 of the Rules of Practice for Adjudicative Proceedings and decisions of the Commission, counsel for Great-West Healthcare will be required to consult with and obtain an affidavit from William Patten, Director of Network Development for the Midwest Region of Great-West Life & Annuity Insurance Company.


5. The documents in question were assembled with the assistance of Mr. Patten's predecessor, Patrick Neary, who was familiar with such documents. Mr. Neary resigned his position in September, 2004, after he was deposed in this matter. Mr. Patten will be required to familiarize himself with such documents in order to assist counsel and execute the foregoing affidavit. Mr. Patten is currently out of the office and unavailable to counsel until January 3, 2005.

6. An extension of time, to and including January 11, 2005, for Great-West Health Care to file a motion seeking *in camera* treatment is reasonable and appropriate under the foregoing circumstances.

WHEREFORE, Great-West Healthcare of Illinois, Inc. respectfully requests that the time in which it may move obtain *in camera* treatment for material, or portions thereof, offered by Respondents be extended to and including January 11, 2005.

Dated: December 29, 2004

GREAT-WEST HEALTHCARE OF
ILLINOIS, INC.

By: 
One of its attorneys

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CERTIFICATE OF SERVICE

I hereby certify that on December 29, 2004, a copy of the foregoing Motion To Extend Time In Which To Move To Obtain *In Camera* Treatment was served by overnight courier delivery on:

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

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Franklin S. Schwerin

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ORDER

Upon motion of Great-West Healthcare of Illinois, Inc. (“Great-West Healthcare”), it is hereby ordered that the time in which Great-West Healthcare may move to obtain *in camera* treatment for material, or portions thereof, offered by Respondents, Evanston Northwestern Healthcare Corporation and ENH Medical Group, Inc., is extended to and including January 11, 2005.

ENTER:

Administrative Law Judge

Prepared By:

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