**ORIGINAL** 

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

O5 04 2011

554397
SECRETARY

	)	
In the Matter of	)	
	)	DOCKET NO: 9346
ProMedica Health System, Inc.	)	PUBLIC
a corporation.	)	
	)	
	)	

## NON-PARTY WOOD COUNTY HOSPITAL'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO MOVE FOR IN CAMERA TREATMENT OF CONFIDENTIAL DATA DESIGNATED BY COMPLAINT COUNSEL

Non-Party Wood County Hospital ("WCH") files this motion to extend the time permitted for it to move for *in camera* treatment of the WCH data that is included in the underlying data supporting hearing exhibit PX01816 designated by Complaint Counsel. The underlying data that is part of said exhibit designated by Complaint Counsel were produced by WCH under the Protective Order Governing Discovery Material filed in this matter on January 6, 2011 and had been designated as "Confidential".

By letter dated April 28, 2011, Complaint Counsel designated for possible introduction at the hearing in the above-referenced matter exhibit PX01816 which contains confidential data produced by WCH, and which may be introduced at the upcoming hearing as underlying data in support of said exhibit. The Scheduling Order in this matter requires that any motion seeking to have *in camera* treatment needs to be filed by May 5, 2011. WCH, in consultation with its undersigned counsel, is in the process of preparing the showing necessary to obtain *in camera* treatment for said confidential data it has produced. A short extension of time is needed to complete the data review process and prepare the showing necessary to entitle certain of this data

in camera treatment. WCH requests an extension until May 12, 2011, for the filing of its motion for in camera treatment of hearing exhibits designated by Complaint Counsel.

Complaint Counsel and Respondents' Counsel have indicated that they will not oppose WCH's request for an extension of time.

Dated: May 3, 2011

Respectfully submitted,

/s/ Edward A. Matto Edward a. Matto

Edward A. Matto Steptoe & Johnson PLLC 41 South High Street, Suite 2200

Columbus, OH 43215 Telephone: (614) 458-9889 Facsimile: (614) 221-0952

Email: ed.matto@steptoe-johnson.com

Counsel for Non-Party Wood County Hospital

## UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION

In the Matter of ProMedica Health System, Inc.	) ) ) DOCKET NO: 9346 ) PUBLIC
a corporation.	) ) )
FILING OF WOOD COUNTY HOS TREATMENT OF	CHEDULING ORDER DEADLINE FOR THE PITAL'S MOTION SEEKING IN CAMERA CONFIDENTIAL DATA COMPLAINT COUNSEL
	ood County Hospital's Motion for Extension of Time
to Move for In Camera Treatment of Confidence	ential Data Designated by Complaint Counsel, it is
hereby ordered that Wood County Hospital s	shall be given until May 12, 2011, to file a motion
seeking in camera treatment of confidential of	data identified in Complaint Counsel's letter of April
28, 2011.	
ORDERED:	
	The Heaventh D. M. deed Charles
	The Honorable D. Michael Chappell Chief Administrative Law Judge
Dated:	

## CERTIFICATE OF SERVICE

I hereby certify that on May 3, 2011, I caused the foregoing Non-Party Wood County Hospital's Unopposed Motion for Extension of Time to Move for *In Camera* Treatment of Confidential Data Designated by Complaint Counsel and [PROPOSED] Order Modifying Scheduling Order Deadline for the Filing of Wood County Hospital's Motion Seeking *In Camera* Treatment of Confidential Data to be filed electronically using the Federal Trade Commission's E-Filing System and overnight Federal Express with:

Donald S. Clark Secretary Federal Trade Commission 600 Pennsylvania Avenue, NW, Room H-113 Washington, DC 20580

I also certify I delivered via electronic mail and overnight Federal Express on May 3, 2011, a true and correct copy of the foregoing Non-Party Wood County Hospital's Unopposed Motion for Extension of Time to Move for *In Camera* Treatment of Confidential Data Designated by Complaint Counsel and [PROPOSED] Order Modifying Scheduling Order Deadline for the Filing of Wood County Hospital's Motion Seeking *In Camera* Treatment of Confidential Data to:

Honorable D. Michael Chappell Chief Administrative Law Judge Federal Trade Commission 600 Pennsylvania Avenue, NW, Room H-110 Washington, DC 20580 oalj@ftc.gov

I also certify that I served true and correct copies of the foregoing Non-Party Wood County Hospital's Unopposed Motion for Extension of Time to Move for *In Camera* Treatment of Confidential Data Designated by Complaint Counsel and [PROPOSED] Order Modifying Scheduling Order Deadline for the Filing of Wood County Hospital's Motion Seeking *In Camera* Treatment of Confidential Data by electronic mail on May 3, 2011 to:

Matthew J. Reilly Jeffrey H. Perry Sara Y. Razi Jeanne H. Liu Alexis J. Gilman Stephanie L. Reynolds Janelle L. Filson Maureen B. Howard
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580
mreilly@ftc.gov
jperry@ftc.gov
srazi@ftc.gov
giliu@ftc.gov
agilman@ftc.gov
sreynolds@ftc.gov
jfilson@ftc.gov
mhoward@ftc.gov

David Marx Jr.
Stephen Y. Wu
Erin C. Arnold
Amy J. Carletti
McDermott Will & Emery LLP
227 W. Monroe Street
Chicago, IL 60606
dmarx@mwe.com
swu@mwe.com
earnold@mwe.com
acarletti@mwe.com

Amy Hancock Jennifer L. Westbrook Vincent C. van Panhuys Carrie Amezcua Christine G. Devlin Daniel Powers James Camden Pamela A. Davis McDermott Will & Emery LLP 600 13th Street, NW Washington, DC 20005 ahancock@mwe.com jwestbrook@mwe.com vvanpanhuys@mwe.com camezcua@mwe.com cdevlin@mwe.com dgpowers@mwe.com jcamden@mwe.com pdavis@mwe.com

1s/ Edward A. Matto Elwala. Matto

Edward A. Matto Steptoe & Johnson PLLC 41 South High Street, Suite 2200 Columbus, OH 43215

Telephone: (614) 458-9889 Facsimile: (614) 221-0952

Email: ed.matto@steptoe-johnson.com

Counsel for Non-Party Wood County Hospital