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UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION OFFICE OF ADMINISTRATIVE LAW JUDGES

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| In the Matter of |) | |
| |) | |
| ProMedica Health System, Inc., |) | DOCKET NO. 9346 |
| Respondent. |) | PUBLIC |
| |) | |

NON-PARTY CONNECTICUT GENERAL LIFE INSURANCE CO.'S UNOPPOSED
MOTION FOR EXTENSION OF TIME TO MOVE FOR IN CAMERA TREATMENT OF
CERTAIN RECORDS, TESTIMONY AND ELECTRONIC PATIENT CLAIMS DATA
DESIGNATED BY COMPLAINT COUNSEL AND RESPONDENT'S COUNSEL

Non party Connecticut General Life Insurance Co. ("CIGNA") hereby moves to extend by one week the time permitted for it to move for *in camera* treatment of certain CIGNA documents, select investigational hearing testimony by a CIGNA employee, and CIGNA's electronic patient claims data (the "CIGNA Confidential Materials") that Complaint Counsel or Respondent's Counsel (or both) have stated they may seek to introduce into evidence in the above-captioned matter.

Complaint Counsel and Respondent's Counsel identified to CIGNA by emails dated April 26 and 27, 2011, and April 28, 2011, respectively, the specific CIGNA Confidential Materials that they may seek to introduce into evidence at trial. CIGNA, together with the undersigned counsel, has been reviewing the CIGNA Confidential Materials and identifying those for which CIGNA will seek *in camera* treatment. Additional time, however, is needed to complete the submission to the Court making the requisite showing under Rule 3.45(b) that those CIGNA Confidential Materials are entitled to *in camera* treatment.

CIGNA has conferred with Complaint Counsel and Respondent's Counsel and they do not oppose this motion.

For the foregoing reasons, CIGNA requests that the Court extend the deadline by which CIGNA may file its anticipated motion seeking *in camera* treatment of the CIGNA Confidential Materials until Thursday, May 12, 2011.

Dated: May 5, 2011

BRIAN K. GRUBE/by TD

Brian K. Grube Jones Day North Point 901 Lakeside Ave. Cleveland, OH 44114-1190

Tele: (216) 586-3939 Fax: (216) 579-0212 bkgrube@jonesday.com

UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION OFFICE OF ADMINISTRATIVE LAW JUDGES

| In the Matter of |) |
|-----------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|
| ProMedica Health System, Inc., Respondent. |) DOCKET NO. 9346) <u>PUBLIC</u> |
| INSURANCE CO.'S UNOPPOSED FOR IN CAMERA TREATMEN | G NON-PARTY CONNECTICUT GENERAL LIFE MOTION FOR EXTENSION OF TIME TO MOVE T OF CERTAIN RECORDS, TESTIMONY AND DATA DESIGNATED BY COMPLAINT COUNSEL |
| | SPONDENT'S COUNSEL |
| Upon consideration of Non Part | y Connecticut General Life Insurance Co.'s Unopposed |
| Motion for Extension of Time to Move | for In Camera Treatment of Certain Records, Testimony |
| and Electronic Patient Claims Data Des | ignated by Complaint Counsel and Respondent's |
| Counsel, it is hereby ordered that the mo | otion is GRANTED, and CIGNA may submit a motion |
| seeking <i>in camera</i> treatment for any ma | aterials designated by Complaint Counsel or Respondent's |
| Counsel by no later than Thursday, May | y 12, 2011. |
| DATED:, 2011 | |
| | The Honorable D. Michael Chappell Chief Administrative Law Judge |

CERTIFICATE OF SERVICE

I, Brian K. Grube, hereby certify that on May 5, 2011, I caused to be filed via hand delivery a paper original with signature and two paper copies of the foregoing Non Party Connecticut General Life Insurance Co.'s Unopposed Motion for Extension of Time to Move for *In Camera* Treatment of Certain Records, Testimony and Electronic Patient Claims Data Designated by Complaint Counsel and Respondent's Counsel with:

Donald S. Clark
Office of the Secretary
Federal Trade Commission
600 Pennsylvania Avenue, NW, H-135
Washington, DC 20580
dclark@ftc.gov

I also certify that on May 5, 2011 I caused to be delivered via electronic mail and hand delivery a true and correct copy of the foregoing Non Party Connecticut General Life Insurance Co.'s Unopposed Motion for Extension of Time to Move for *In Camera* Treatment of Certain Records, Testimony and Electronic Patient Claims Data Designated by Complaint Counsel and Respondent's Counsel to:

The Honorable D. Michael Chappell Chief Administrative Law Judge Federal Trade Commission 600 Pennsylvania Avenue, NW, H-106 Washington, DC 20580 oalj@ftc.gov

I also certify that on May 5, 2011 I caused to be served true and correct copies of the foregoing Non Party Connecticut General Life Insurance Co.'s Unopposed Motion for Extension of Time to Move for *In Camera* Treatment of Certain Records, Testimony and Electronic Patient Claims Data Designated by Complaint Counsel and Respondent's Counsel upon the following individuals by electronic mail:

Jeanne Liu Attorney, Bureau of Competition U.S. Federal Trade Commission 601 New Jersey Ave, NW Washington, D.C. 20001 jliu@ftc.gov

David Marx, Jr. McDermott Will & Emery LLP 227 W. Monroe Street Suite 4400 Chicago, IL 60606 dmarx@mwe.com

BRIAN K. GRUBE/LY TD Brian K. Grube