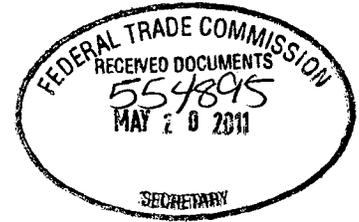


ORIGINAL



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

**In the Matter of
ProMedica Health System, Inc.
a corporation**

**DOCKET NO. 9346
PUBLIC VERSION**

**MDA Engineering, Inc. MOTION FOR *IN CAMERA* TREATMENT
OF HEARING EXHIBITS**

I. Introduction

MDA Engineering, Inc respectfully moves for *in camera* treatment of several proposed exhibits, pursuant to Rule 3.45 of the Federal Trade Commission's Rules of Practice.

The first exhibit relates to the declaration presented by Craig R. Kohring to the Federal Trade Commission on October 4, 2010. Paragraph 2 of this Declaration discusses confidential business information, which if disclosed, could harm the company's competitive stature in the marketplace. The remaining exhibits are files produced to Attorneys McDermott, Will and Emory LLP dated March 10, 2011 that include Medical billings, Health Insurance quotations, and Health Insurance renewal rates.

II. Discussion

Rule 3.45 (b) requires that material constituting sensitive personal information be given permanent *in camera* treatment. The rule notes that "sensitive personal information" includes

sensitive health information identifiable by individual, such as an individuals' medical records. These files also contain information that is likely to be competitively sensitive, including referral sources, billed charges and payer information.

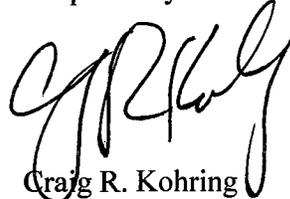
III. Conclusion

Disclosure of the information contained in these documents and the data files will likely result in serious competitive injury or will result in the disclosure of sensitive health information. Disclosure would not materially promote the resolution of this matter not assist the public's understanding of the litigation, particularly in light of the copious other evidence and testimony likely to be available to the public. *In camera* treatment is therefore appropriate.

For the foregoing reason, MDA Engineering Inc. requests that the identified exhibits receive *in camera* treatment.

Dated: May 17, 2011

Respectfully Submitted,



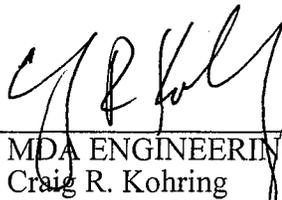
Craig R. Kohring
Chief Financial Officer
MDA Engineering, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on May 18, 2011, I filed *via* first-class mail a paper original of the **Filing of Motions Seeking *In Camera* Treatment** with:

Fenice Wade
Office of the Secretary
Federal Trade Commission
600 Pennsylvania Avenue, NW, Room 110
Washington, DC 20580
fwade@ftc.gov

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