

ORIGINAL

**IN THE 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

**NON-PARTIES UNITEDHEALTHCARE, INC. AND UNITEDHEALTHCARE OF OHIO
INC.'S MOTION FOR LEAVE TO FILE SUPPLEMENTAL
MOTION FOR *IN CAMERA* TREATMENT OF PROPOSED EVIDENCE**

Non-Parties UnitedHealthcare, Inc. and UnitedHealthcare of Ohio, Inc. (collectively, "United") seek leave to file a Supplemental Motion for *In Camera* Treatment of Proposed Evidence.

On May 5, 2011, United moved for *in camera* treatment of 47 documents. On May 25, 2011, this Court granted United's motion regarding all but the six documents listed below:

- PX02488/UHC-FTC-PROD001891--UHC-FTC-PROD001899 (Exhibit 22)
- PX02489/UHC-FTC-PROD001918--UHC-FTC-PROD001926 (Exhibit 23)
- PX02490/UHC-FTC-PROD001927--UHC-FTC-PROD001935 (Exhibit 24)
- PX02491/UHC-FTC-PROD001936--UHC-FTC-PROD001944 (Exhibit 25)
- UHC-PM-PROD000028 (Exhibit 26)
- PX02486/UHC-FTC-PROD001410--UHC-FTC-PROD001562 (Exhibit 42)

Each of the documents listed above contains commercially and/or competitively sensitive and proprietary business information. Therefore, United respectfully requests an opportunity to clarify and supplement the information it presented to justify *in camera* treatment. United has taken substantial measures to guard the secrecy of the information contained in the documents and disclosure of these documents would cause clearly defined, serious injury to United.

Simultaneously with this Motion, United is filing a Supplemental Motion for *In Camera* Treatment of Proposed Evidence which attaches copies of the six exhibits and sets forth in detail additional information that explains why these sensitive business documents should receive *in camera* treatment.

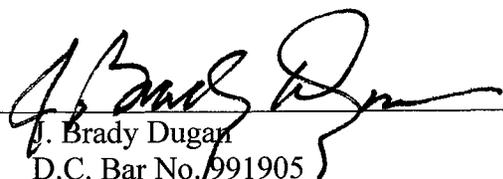
Pursuant to 16 C.F.R. § 3.45 and Paragraph 7 of the Scheduling Order, United respectfully moves for leave to file a renewed motion for *in camera* treatment of the six documents listed above.

DATED: May 31, 2011

Respectfully submitted,

AKIN GUMP STRAUSS HAUER & FELD, LLP

By: _____


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**ATTORNEYS FOR NON-PARTIES
UNITEDHEALTHCARE, INC. and
UNITEDHEALTHCARE OF OHIO, INC.**

CERTIFICATE OF SERVICE

I hereby certify that on May 31, 2011, I caused an original, one paper copy, and one electronic copy of Non-Parties UnitedHealthcare, Inc. and UnitedHealthcare of Ohio, Inc.'s Motion for Leave to File Supplemental Motion for *In Camera* Treatment of Proposed Evidence to be filed with the Secretary of the Commission and the Chief Administrative Law Judge:

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

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 this same date, I caused copies of the foregoing motion to be served by electronic mail to:

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- UHC-PM-PROD000028 (Exhibit 26)
- PX02486/UHC-FTC-PROD001410--UHC-FTC-PROD001562 (Exhibit 42)

IT IS FURTHER ORDERED that only authorized Federal Trade Commission (“Commission”) personnel, and court personnel concerned with judicial review may have access to the above-referenced information, provided that I, the Commission, and reviewing courts may disclose such *in camera* information to the extent necessary for the proper disposition of the proceeding.

ORDERED:

The Honorable D. Michael Chappell
Chief Administrative Law Judge

DATED: _____