

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



In the Matter of )  
)  
PHOEBE PUTNEY HEALTH SYSTEM, )  
INC., and )  
)  
PHOEBE PUTNEY MEMORIAL )  
HOSPITAL, INC., and )  
)  
PHOEBE NORTH, INC., and )  
)  
HCA INC., and )  
)  
PALMYRA PARK HOSPITAL, INC., and )  
)  
HOSPITAL AUTHORITY OF ALBANY- )  
DOUGHERTY COUNTY. )

DOCKET NO. 9348

PUBLIC DOCUMENT

**UNOPPOSED MOTION TO EXTEND THE TIME FOR  
UNITED HEALTHCARE SERVICES, INC. TO FILE A MOTION TO QUASH, OR IN  
THE ALTERNATIVE TO LIMIT, SUBPOENA DUCES TECUM**

Non-party United HealthCare Services, Inc., by and through its attorneys, hereby moves pursuant to Rules 3.22, 3.34, and 4.3(b) of the Federal Trade Commission's Rules of Practice for Adjudicative Proceedings to extend the deadline for moving to quash or limit the subpoena *duces tecum* (the "Subpoena") issued to it in this proceeding on October 3, 2014. United HealthCare Services, Inc. seeks a brief extension of the deadline for filing a motion to quash or limit the Subpoena from October 15, 2014 to October 22, 2014. Counsel for Respondents Phoebe Putney Memorial Hospital, Inc., Phoebe Putney Health System, Inc., and Hospital Authority of Albany-Dougherty County (collectively, "Respondents"), has been consulted regarding this motion and does not oppose the requested relief.

The Subpoena seeks a broad range of documents and, as drafted, will require United HealthCare Services, Inc. to collect, review, process, and produce an enormous volume of data by October 24, 2014. United HealthCare Services, Inc. is in the process of negotiating with Respondents' counsel over the breadth of the Subpoena, and its objections thereto, in a good faith effort to comply with its obligations while reducing the burden imposed by the Subpoena. Respondents' counsel does not oppose an extension of time through October 22, 2014 in order to afford United HealthCare Services, Inc. and Respondents time to continue to negotiate the scope of the Subpoena. An extension will potentially avoid the necessity of filing a motion to quash or limit the Subpoena.

Accordingly, United HealthCare Services, Inc. respectfully requests that its Unopposed Motion to Extend the Time for United HealthCare Services, Inc. to File a Motion to Quash, or in the Alternative to Limit, Subpoena *Duces Tecum* be granted and that United HealthCare Services, Inc. be given until October 22, 2014 to file any such motion. A proposed order granting the requested relief is attached hereto as Exhibit A.

Dated: October 14, 2014

Respectfully Submitted,

*/s/ J. Brady Dugan*

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*Attorneys for United HealthCare Services, Inc.*

## CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of October, 2014, a true and correct copy of the foregoing “Unopposed Motion to Extend the Time for United HealthCare Services, Inc. to File a Motion to Quash, or in the Alternative to Limit, Subpoena *Duces Tecum*” was electronically filed with the Federal Trade Commission using the FTC E-File system which will automatically send e-mail notification of such filing to:

Donald S. Clark  
Secretary  
Federal Trade Commission  
Room H113  
600 Pennsylvania Avenue, NW  
Washington, D.C. 20580  
[dclark@ftc.gov](mailto:dclark@ftc.gov)

I also certify that a copy of the foregoing will be delivered via electronic mail and Federal Express to:

The Honorable D. Michael Chappell  
Administrative Law Judge  
Federal Trade Commission  
Room H110  
600 Pennsylvania Avenue, NW  
Washington, D.C. 20580  
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and by electronic mail to:

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HCA Inc. and Palmyra Park  
Hospital, Inc.*

Dated October 14, 2014

*/s/ J. Brady Dugan*  
\_\_\_\_\_  
J. Brady Dugan

**EXHIBIT A**  
**PROPOSED ORDER**

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

In the Matter of	)	
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PHOEBE PUTNEY HEALTH SYSTEM, INC., and	)	
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PHOEBE PUTNEY MEMORIAL HOSPITAL, INC., and	)	DOCKET NO. 9348
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PHOEBE NORTH, INC., and	)	
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HCA INC., and	)	
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PALMYRA PARK HOSPITAL, INC., and	)	
	)	
HOSPITAL AUTHORITY OF ALBANY- DOUGHERTY COUNTY.	)	

**[PROPOSED] ORDER GRANTING UNOPPOSED MOTION TO EXTEND THE TIME  
FOR UNITED HEALTHCARE SERVICES INC. TO FILE A MOTION TO QUASH, OR  
IN THE ALTERNATIVE TO LIMIT, SUBPOENA DUCES TECUM**

Non-party United HealthCare Services, Inc. filed an Unopposed Motion to Extend the Time to File a Motion to Quash, or in the Alternative to Limit, Subpoena *Duces Tecum* issued by Phoebe Putney Health System, Inc., Phoebe Putney Memorial Hospital, Inc., and Hospital Authority of Albany-Dougherty County (“Respondents”) on October 3, 2014. United HealthCare Services, Inc. requests an extension to and including October 22, 2014 to file any such motion to quash or limit. United HealthCare Services, Inc.’s motion for extension is not opposed by Respondents. Having considered the motion, it is

GRANTED; and

IT IS HEREBY ORDERED that the deadline for United HealthCare Services, Inc. to file a Motion to Quash or Limit the Subpoena *Duces Tecum* the Respondents issued to United HealthCare Services, Inc. is extended to and including October 22, 2014.

Signed this \_\_\_\_ day of October, 2014.

\_\_\_\_\_  
D. Michael Chappell  
Administrative Law Judge