

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



In the Matter of )  
)  
)  
Advocate Health Care Network, )  
a corporation; )  
)  
Advocate Health and Hospitals Corporation, )  
a corporation; )  
)  
and )  
)  
NorthShore University HealthSystem, )  
a corporation. )

Docket No. 9369

PUBLIC DOCUMENT

**RESPONDENTS’ MOTION FOR LEAVE TO FILE A REPLY IN SUPPORT OF  
RESPONDENTS’ MOTION TO STAY THE ADMINISTRATIVE HEARING**

Pursuant to Commission Rule 3.22(d), Advocate Health Care Network and Advocate Health and Hospitals Corporation (together, “Advocate”) and NorthShore University Health System (“NorthShore,” collectively “Respondents”), hereby request leave to file a reply brief. Rule 3.22(d) permits reply pleadings with leave of Court, where that pleading would draw the Court’s attention to recent important developments. A reply is warranted here to clarify Respondents’ intentions not to proceed with the administrative hearing in light of a final decision from the Federal Court—a position that Respondents could not take at the time the motion was filed—as well as to address Complaint Counsel’s new argument that the transaction is premature with new evidence not available when the motion was filed. For the foregoing reasons, good cause exists for grant of this motion. Respondents respectfully request that the Court receive and file the proposed reply brief attached herein as Attachment A.

Dated: February 24, 2016

Respectfully submitted,

s/ David E. Dahlquist

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***Counsel for Respondent NorthShore  
University HealthSystem***

s/ Robert W. McCann

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***Counsel for Respondents Advocate Health  
Care Network and Advocate Health and  
Hospitals Corp.***



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

<b>In the Matter of</b>	)	<b>Docket No. 9369</b>
	)	
	)	
<b>Advocate Health Care Network, a corporation;</b>	)	
	)	
<b>Advocate Health and Hospitals Corporation, a corporation;</b>	)	
	)	<b>PUBLIC DOCUMENT</b>
<b>and</b>	)	
	)	
<b>NorthShore University HealthSystem, a corporation.</b>	)	
	)	

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**CERTIFICATION OF MEET AND CONFER**

Pursuant to Paragraph 4 of the Scheduling Order entered on January 20, 2016, Respondents' counsel certifies that Counsel for Respondents met and conferred with Complaint's counsel on February 24, 2016 in a good faith effort to resolve the issues in Respondents' Motion for Leave to File Reply in Support of Respondents' Motion to Stay the Administrative Hearing and that the parties were unable to reach agreement.

Dated: February 24, 2016

Respectfully submitted,

s/ David E. Dahlquist

---

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s/ Robert W. McCann

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***Counsel for Respondents Advocate Health  
Care Network and Advocate Health and  
Hospitals Corp.***

**ATTACHMENT A**



motion under FTC Rule 3.26, thereby automatically staying the administrative hearing.

Complaint Counsel's purported concern that Respondents' request for a brief stay will affect the swift resolution of the administrative case, therefore, is without support. Complaint Counsel's further suggestion that there could be a timely appeal process following a final decision in the Federal Action ignores that Respondents clearly request to stay the hearing for 60 days following a final decision from the *District Court*. Respondents do not seek to stay the hearing pending any appeals.

*Second*, Respondents' motion is not premature. Complaint Counsel has repeatedly used the administrative hearing date to suggest to the Honorable Judge Alonso that he need not conduct a full and developed hearing because Respondents will have that opportunity before the administrative court.<sup>2</sup> *See, e.g.*, Ex. 1, Dec. 22, 2015 Tr. at 9:2-16 ("We think that actually the whole thing should take place over two or three days. ... [W]e just don't believe that it's necessary to take, you know, days or weeks to get this done, particularly when we're running straight into a full trial."); Ex. 2, Jan. 6, 2016 Tr. at 19:13-20:5 ("So this is a situation in which certainly Your Honor needs to make a very important decision here, but there is a trial that is ramping up as we speak. ... [W]e still think something on the order of ... three days makes completely good sense."); Ex. 3, Feb. 11, 2016 Tr. at 8:15-22 ("The point of these kinds of proceedings is to freeze the situation so that the parties can go to trial. ... [Judge Cole] ... was a little surprised we were talking about six days."). Therefore, Complaint Counsel's use of the close proximity of the administrative hearing as leverage to influence Respondents' rights to a full and fair hearing on the preliminary injunction motion in the Federal Case makes Respondents' motion timely—the harm exists today.

---

<sup>2</sup> Respondents disagree with Complaint Counsel's argument for multiple reasons, including, because the rules governing the administrative proceeding differ markedly from those in federal court.



Dated: February 24, 2016

Respectfully submitted,

s/ David E. Dahlquist

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***Counsel for Respondents Advocate Health  
Care Network and Advocate Health and  
Hospitals Corp.***

**CERTIFICATE OF SERVICE**

I hereby certify that on February 24, 2016, I caused a true and accurate copy of the foregoing to be served electronically through the FTC's e-filing system and on February 24, 2016, I caused a true and accurate copy of the foregoing to be served as follows:

J. Thomas Greene, Esq.  
Charles Loughlin, Esq.  
Sean P. Pugh, Esq.  
Federal Trade Commission  
Bureau of Competition  
600 Pennsylvania Avenue, NW  
Washington, D.C. 20580  
Telephone: (202) 326-5196  
Facsimile: (202) 326-2286  
Email: [tgreene2@ftc.gov](mailto:tgreene2@ftc.gov)  
Email: [cloughlin@ftc.gov](mailto:cloughlin@ftc.gov)  
Email: [spugh@ftc.gov](mailto:spugh@ftc.gov)

The Honorable D. Michael Chappell  
Chief Administrative Law Judge  
600 Pennsylvania Ave., NW  
RM. H-110  
Washington, DC 20580

*Counsel for Complainant Federal  
Trade Commission*

s/ Laurie T. Curnes

Laurie T. Curnes

**CERTIFICATE FOR ELECTRONIC FILING**

I certify that the electronic copy sent to the Secretary of the Commission is a true and correct copy of the paper original and that I possess a paper original of the signed documents that is available for review by the parties and the adjudicator.

Dated: February 24, 2016

s/ Laurie T. Curnes

Laurie T. Curnes

# Exhibit 1

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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

FEDERAL TRADE COMMISSION and	)	
STATE OF ILLINOIS,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	No. 15 C 11473
	)	
ADVOCATE HEALTH CARE NETWORK,	)	
ADVOCATE HEALTH AND HOSPITALS	)	
CORPORATION, and NORTHSORE	)	
UNIVERSITY HEALTHSYSTEM,	)	Chicago, Illinois
	)	December 22, 2015
Defendants.	)	9:30 a.m.

TRANSCRIPT OF PROCEEDINGS  
BEFORE THE HONORABLE JORGE L. ALONSO

APPEARANCES:

For the Plaintiff	FEDERAL TRADE COMMISSION
FTC:	BY: MR. JAMES THOMAS GREENE
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	FEDERAL TRADE COMMISSION
	BY: MR. CHRISTOPHER JOHN CAPUTO
	400 7th Street, SW
	Washington, D.C. 20003
	(202) 326-2460
	FEDERAL TRADE COMMISSION
	BY: MR. JAMES DAVIS
	55 West Monroe Street
	Suite 1825
	Chicago, Illinois 60603
	(312) 960-5611

1 counsel has alluded to, Mr. Greene?

2 MR. DAHLQUIST: We certainly want an expeditious  
3 hearing. However, I think some of it does depend on what  
4 their file is. We have no objection -- we believe there will  
5 be a discovery period, Your Honor. We believe depositions  
6 need to be taken of either our clients, as well as third  
7 parties. We believe there's likely third parties within  
8 plaintiffs' file. That once we are able to see who the  
9 declarations are, ask for time to take those depositions. I  
10 think, you know, 30, 60, 90 days is perfectly appropriate  
11 here. That's -- that's the time frame we are looking at, not  
12 extending this beyond that.

13 THE COURT: So in the interim, during those two to  
14 three months, then the parties would anticipate agreeing and  
15 keeping the TRO in place or --

16 MR. DAHLQUIST: Absolutely, Your Honor.

17 MR. GREENE: That's correct.

18 THE COURT: So this isn't a situation then where I  
19 would have to send it to the magistrate judge. I could do it  
20 myself. And Ms. Fratto is busy looking at our schedule. And,  
21 again, that's reasonable, March, April?

22 MR. GREENE: Yeah, late March, early April, Your  
23 Honor. Obviously just to a large degree, it depends on how  
24 long you would feel comfortable in reviewing this material. I  
25 mean, I think I -- we have a different perspective on

1 duration. I believe opposing counsel is talking about four  
2 days for their part of the case. We think that actually the  
3 whole thing should take place over two to three days. I think  
4 that this can be made quite efficient, particularly if Your  
5 Honor is comfortable with us entering, for example, the expert  
6 reports as exhibits, even though they are hearsay, so that we  
7 can -- you would have a complete -- full access to the  
8 materials. I just don't -- we just don't believe that it's  
9 necessary to take, you know, days or weeks to get this done,  
10 particularly when we're running straight into a full trial.  
11 But --

12 THE COURT: So you're saying two to three plus four  
13 to five or you're saying --

14 MR. GREENE: No, no. I'm saying --

15 THE COURT: -- two to three --

16 MR. GREENE: -- two to three total.

17 Also, Your Honor, we are prepared on behalf of the  
18 plaintiffs to give them virtually immediate access to the  
19 declarations we've received and essentially a full Rule 26 set  
20 of disclosures.

21 However, they just sent us -- and it's not a  
22 problem -- but they've just sent us in the last ten minutes a  
23 red-lined version of Your Honor's standard confidentiality  
24 order. We'll take a look at that today, try and get that back  
25 to them with some appropriate suggestions. That actually is

# Exhibit 2



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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

FEDERAL TRADE COMMISSION and	)	
STATE OF ILLINOIS,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	No. 15 C 11473
	)	
ADVOCATE HEALTH CARE NETWORK,	)	
ADVOCATE HEALTH AND HOSPITALS	)	
CORPORATION, and NORTHSORE	)	
UNIVERSITY HEALTHSYSTEM,	)	Chicago, Illinois
	)	January 6, 2016
Defendants.	)	9:55 a.m.

TRANSCRIPT OF PROCEEDINGS  
BEFORE THE HONORABLE JORGE L. ALONSO

APPEARANCES:

For the Plaintiff	FEDERAL TRADE COMMISSION
FTC:	BY: MR. JAMES THOMAS GREENE
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	MR. SEAN PUGH
	MS. SOPHIA VANDERGRIFT
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	Washington, D.C. 20580
	(202) 326-5196

	FEDERAL TRADE COMMISSION
	BY: MR. CHRISTOPHER JOHN CAPUTO
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For the Plaintiff	ILLINOIS ATTORNEY GENERAL'S OFFICE
State of Illinois:	BY: MR. ROBERT W. PRATT
	100 West Randolph Street
	13th Floor
	Chicago, Illinois 60601
	(312) 814-3722

1 have to do, after the Supreme Court in Winter said you have to  
2 do that for an injunction. They have the same standard as  
3 anybody else who comes in here for an injunction. And --

4 THE COURT: Counsel, you're not --

5 MR. ROBERTSON: -- we really want Your Honor to give  
6 us some time.

7 THE COURT: You're not worried about their ability to  
8 present a case. Obviously --

9 MR. ROBERTSON: Oh, no.

10 THE COURT: -- they're talking about the case they  
11 want to present. And --

12 MR. ROBERTSON: Your Honor, if he doesn't want any  
13 time to present his case, I don't care. I have -- I have a --  
14 the way it works, it's a burden-shifting thing. And he comes  
15 in and says, oh, I have a market and I have market power; and  
16 then I have to come in and explain to you why that's not true.  
17 So it puts -- I have to put on evidence. And I don't want to  
18 be curtailed from doing that.

19 THE COURT: And you --

20 MR. GREENE: This is --

21 THE COURT: -- won't be.

22 MR. GREENE: -- a caricature, Your Honor, in the  
23 real -- the real world.

24 But let me just mention, I think --

25 THE COURT: Some of these issues aren't before me.

1 But my understanding is that the FTC is proceeding on parallel  
2 tracks.

3 MR. GREENE: Absolutely, Your Honor. I -- apropos of  
4 that parallel track, Mr. Robertson and his client answered the  
5 administrative complaint yesterday. So we're in -- that  
6 process is continuing. We will have a scheduling conference  
7 likely Friday of next week. Trial is likely to be set. That  
8 will depend on what the administrative law judge decides. But  
9 at least currently, we believe that date to be 5 -- May 17th  
10 of this year. There are very strict guidelines for the  
11 administrative law judge in terms of when he needs to decide  
12 things, get it to the Commission and things of that nature.  
13 So this is a situation in which certainly Your Honor needs to  
14 make a very important decision here, but there is a trial that  
15 is ramping up as we speak.

16 With respect to -- and with respect to my colleague  
17 and former colleague at the Commission -- rigorous analysis  
18 certainly is something that can take place in an efficient  
19 amount of time from our perspective.

20 Just to give Your Honor some sense of it, the  
21 District of Columbia district court recently heard an  
22 evidentiary hearing involving Sysco foods. It was the  
23 proposed purchase by Sysco of US Foods. That had 30 different  
24 local markets, two national markets; and it was basically a  
25 seven-day evidentiary hearing.

1           We think that, given the relatively less complex case  
2 that Your Honor -- I mean, it's not that it's not complex, but  
3 it's relatively less demanding than Sysco, we still think  
4 something on the order of what fits within your calendar as we  
5 understand it of three days makes completely good sense.

6           THE COURT: Gentlemen, I don't want to rush you.  
7 I've got a phone call to make. Can everyone stick around for  
8 a few more minutes? Why don't we pass the case.

9           MR. GREENE: Yes.

10          MR. ROBERTSON: Sure, Your Honor.

11          MR. DAHLQUIST: Yes, Your Honor.

12          THE COURT: Let's pass the case momentarily. We will  
13 recall it.

14          MR. ROBERTSON: Thank you, Your Honor.

15          THE COURT: Thank you.

16          (Whereupon the Court gave its attention to other matters,  
17 after which the following proceedings were had:)

18          THE CLERK: Recalling, 15 C 11473, Federal Trade  
19 Commission v. Advocate Health Care.

20          MR. DAHLQUIST: Your Honor, our colleagues from the  
21 FTC are still in the hall, I believe.

22          (Brief pause.)

23          THE COURT: Okay. So we are all back.

24          And, counsel, just to make clear what your objection  
25 is, the plaintiffs' position is very specific about how time

# Exhibit 3

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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

FEDERAL TRADE COMMISSION and	)	
STATE OF ILLINOIS,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	No. 15 C 11473
	)	
ADVOCATE HEALTH CARE NETWORK,	)	
ADVOCATE HEALTH AND HOSPITALS	)	
CORPORATION, and NORTHSORE	)	
UNIVERSITY HEALTHSYSTEM,	)	Chicago, Illinois
	)	February 11, 2016
Defendants.	)	10:00 a.m.

TRANSCRIPT OF PROCEEDINGS  
BEFORE THE HONORABLE JORGE L. ALONSO

APPEARANCES:

For the Plaintiff	FEDERAL TRADE COMMISSION
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For the Plaintiff	ILLINOIS ATTORNEY GENERAL'S OFFICE
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	Chicago, Illinois 60601
	(312) 814-3722
For the Defendant	HOGAN LOVELLS US LLP
Advocate:	BY: MR. JOHN ROBERT ROBERTSON
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	(202) 637-5600

1 way. Usually the Courts convert them to permanent injunctions  
2 because Courts know it's one hearing. It's never going to --  
3 there's never going to be a second hearing.

4 And that's what I'm suggesting here because, in my  
5 experience in every case, and in 21 years -- and I looked it  
6 up this morning to check to make sure -- it's never happened  
7 where you've had this second trial afterwards in a pre-merger  
8 case. It doesn't happen. That's why -- that's why we're  
9 doing all these crazy 80 depositions in six weeks and doing  
10 all these things that Your Honor has allowed us to do because  
11 this is it for us.

12 THE COURT: Mr. Greene, but the motion to stay is not  
13 agreed?

14 MR. GREENE: It's not agreed to, Your Honor.

15 The Federal Trade Commission amended its rules in  
16 2009 in response to concerns expressed by business entities  
17 and the antitrust bar. The criticism was that those  
18 proceedings were very elongated. They took a great deal of  
19 time. So the Commission responded to that by creating a very  
20 expedited process. The judge in that proceeding is required  
21 to start his trial within five months of the complaint being  
22 filed.

23 We do expect to file a response. Actually we will  
24 oppose the motion that our colleagues have brought. We think  
25 those 2009 rules and regulations really do speak to the

1 question of -- that we have here.

2           With respect to Mr. Robertson's comment that, in  
3 fact, this is a de facto permanent injunction proceeding, we  
4 strongly dispute that. I mean, the operating rule here in the  
5 Seventh Circuit is stated in the Elders Grain decision, which  
6 is a little bit old, but it is a classic. It's at 868 Fed. 2d  
7 901, 902. It really establishes a very special standard of  
8 proof, so a somewhat diminished standard for the PI. This is  
9 a preliminary injunction. The rules and regulations that --  
10 or the rules -- the evidentiary rules that apply to a PI apply  
11 here. No higher standard is required.

12           So I think we -- in order to follow both the Federal  
13 Rules of Civil Procedure, which lay out what a PI is about,  
14 and the applicable case law, it's appropriate for us to go  
15 forward as rapidly as possible. The point of these kinds of  
16 proceedings is to freeze the situation so that the parties can  
17 go to trial.

18           The United States Supreme Court in the University of  
19 Texas v. Camenisch spoke to this, I think, quite articulately.  
20 Actually Judge Cole mentioned this case to us when we were  
21 talking about the duration of this PI. He was a little  
22 surprised we were talking about six days. But in Camenisch,  
23 451 U.S. 290 at 394, 5 -- through 5, the Court basically  
24 explained and reminded all of us that a PI is a preliminary  
25 process. It's designed to freeze the situation and then allow



Notice of Electronic Service

**I hereby certify that on February 24, 2016, I filed an electronic copy of the foregoing Respondents' Motion for Leave to File Reply in Support of Motion to Stay Administrative Hearing, with:**

D. Michael Chappell  
Chief Administrative Law Judge  
600 Pennsylvania Ave., NW  
Suite 110  
Washington, DC, 20580

Donald Clark  
600 Pennsylvania Ave., NW  
Suite 172  
Washington, DC, 20580

**I hereby certify that on February 24, 2016, I served via E-Service an electronic copy of the foregoing Respondents' Motion for Leave to File Reply in Support of Motion to Stay Administrative Hearing, upon:**

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Respondent

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