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



)	
In the matter of)	
)	
Evanston Northwestern Healthcare)	
Corporation,)	Docket No. 9315
a corporation, and)	
)	
ENH Medical Group, Inc.,)	
a corporation.)	
)	

RESPONDENTS' CONSENT MOTION FOR LEAVE TO FILE SUPPLEMENTAL MEMORANDUM IN SUPPORT OF MOTION FOR IN CAMERA TREATMENT OF CERTAIN TRIAL EXHIBITS

Respondent Evanston Northwestern Healthcare Corporation ("ENH") respectfully submits this Consent Motion for Leave to File Supplemental Memorandum in Support of Motion for *In Camera* Treatment of Certain Trial Exhibits. ENH has attached to this Motion a copy of the Supplemental Memorandum with an Amended Exhibit A as well as a Supplemental Brian Washa Declaration.

On January 4, 2005, ENH filed a Motion for *In Camera* Treatment of Certain Trial Exhibits. ENH requests leave to file the contemporaneously-filed supplemental memorandum in support of that motion for two purposes. First, as requested by the Court, and in light of the proposed settlement of Count III, ENH seeks to substantially reduce its original list of trial exhibits for which it seeks *in camera* treatment. Second, the revised list indicates the time period for which ENH is requesting

that each exhibit remain sealed. ENH respectfully refers the Court to the enclosed memorandum, which addresses in more detail the revisions at issue.

Complaint Counsel has indicated that it has no objection to the filing of ENH's Supplemental Memorandum.

For the foregoing reasons, ENH requests that the Court grant this Consent Motion For Leave To File Supplemental Memorandum In Support Of Motion For *In Camera* Treatment Of Certain Trial Exhibits.

DATED:

February 3, 2005

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on February 3, 2005, copies of the foregoing ENH's Consent Motion for Leave to File Memorandum in Support of Motion for *In Camera* Treatment of Certain Exhibits and a proposed order were served (unless otherwise indicated) by email and first class mail, postage prepaid, on:

The Honorable Stephen J. McGuire Chief Administrative Law Judge Federal Trade Commission 600 Pennsylvania Ave. NW (H-106) Washington, DC 20580 (two courtesy copies delivered by messenger only)

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