

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

01 05 2016
580492

In the Matter of

Cabell Huntington Hospital, Inc.
a corporation;

and

Pallottine Health Services, Inc.
a corporation;

and

St. Mary's Medical Center, Inc.
a corporation

ORIGINAL

Docket No. 9366

**RESPONDENT CABELL HUNTINGTON HOSPITAL, INC.'S UNOPPOSED MOTION
FOR ISSUANCE OF SUBPOENA DUCES TECUM TO THE WEST VIRGINIA
HEALTH CARE AUTHORITY AND DEPOSITION SUBPOENA TO ITS CHAIRMAN
MR. JAMES PITROLO UNDER RULE OF PRACTICE 3.36**

Respondent Cabell Huntington Hospital, Inc. (“Respondent”) brings this motion pursuant to Federal Trade Commission (“Commission”) Rule of Practice 3.36, 16 C.F.R. § 3.36, to request the issuance of (1) a subpoena duces tecum for the production of documents to the West Virginia Health Care Authority (“WVHCA”), a West Virginia public agency, and (2) a deposition subpoena directed towards Mr. James Pitrolo (“Mr. Pitrolo”), Chairman of the WVHCA. On December 17, 2015, the Court granted Complaint Counsel’s motion requesting the issuance of a subpoena duces tecum to WVHCA. In addition, Complaint Counsel has listed Mr. Pitrolo on its preliminary witness list, and he provided a detailed declaration to Complaint Counsel in September 2015. The instant motion is intended to ensure that Respondent timely receives all discovery WVHCA provides to Complaint Counsel, and that Respondent is able to

properly prepare for Mr. Pitrolo's anticipated testimony. An unsigned version of the requested subpoenas are attached at **Exhibits A-B**. Complaint Counsel does not oppose Respondent's request to issue the subpoenas, but takes no position on the contents of this motion or the scope of the subpoenas.

ARGUMENT

By this motion, Respondent requests that the Court issue (1) a subpoena duces tecum for the production of documents to the WVHCA, and (2) a deposition subpoena to WVHCA Chairman Mr. Pitrolo. The Court recently granted Complaint Counsel's motion to issue a subpoena duces tecum to the WVHCA, and by the requested subpoena Respondent seeks all documents and information that the WVHCA provides to Complaint Counsel, as well as communications between the WVHCA and Complaint Counsel. Further, Respondent is entitled to take Mr. Pitrolo's deposition because Complaint Counsel listed Mr. Pitrolo on its preliminary witness list. In short, the subpoenas Respondent requests are necessary to ensure that Respondent can properly prepare for Mr. Pitrolo's anticipated testimony. An unsigned version of the requested subpoenas are attached at **Exhibits A-B**. Complaint Counsel does not oppose Respondent's request to issue the subpoenas, but takes no position on the contents of this motion or the scope of the subpoenas.

First, the scope of the material sought in the subpoenas is reasonable. Respondent is entitled to access any discovery materials the WVHCA provides to Complaint Counsel, and the requested subpoena duces tecum is limited to those documents and communications. *See Mauricio v. Duckworth*, 840 F.2d 454, 460 (7th Cir. 1988) (noting that “discovery [is] . . . a level playing field where rules are in place to ensure equal access to material information”). As Chairman of the WVHCA, and an anticipated witness at the upcoming adjudicative hearing, Mr. Pitrolo likely possesses relevant documents and information. Moreover, Mr. Pitrolo provided a detailed declaration to Complaint Counsel in September 2015, rendering it even more reasonable for Respondent to seek his deposition. Therefore, the scope of each requested subpoena is reasonable.

Second, the material sought is relevant to the allegations in the Complaint. The WVHCA administers the state’s Certificate of Need program, under which the agency reviews certain capital expenditures by health care service providers. It also collects, analyzes, and disseminates financial and clinical data to assess hospital utilization within West Virginia, and reviews acute care hospital rates and contracts between health plans and health care service providers. Complaint Counsel sought the production of existing agency reco

Third, the requested documents and testimony cannot be reasonably obtained by other means. The WVHCA is the sole repository of its own records, and Respondent is entitled to receive directly from the WVHCA any materials it might provide to Complaint Counsel and to examine Mr. Pitrolo regarding those materials, as well as the topics identified in his declaration. While the Scheduling Order requires a party to provide to the opposing party copies of documents received from non-parties in response to a subpoena, Complaint Counsel may wait three business days before doing so, and Respondent would be prejudiced by that delay in this expedited proceeding.

Fourth, the requested documents meets the requirements of Rule of Practice 3.37(a), which requires requests for electronically stored information to be specified with reasonable particularity. The subpoena duces tecum requests documents and communications provided to Complaint Counsel by the WVHCA, as well as any communications with Complaint Counsel about this matter, and therefore seeks a clearly defined universe of materials.

In sum, the requested subpoenas meet all four requirements of Rule 3.36(b) of the Commission's Rules of Practice.

CONCLUSION

For the reasons stated above, therefore, Respondent respectfully requests that the Court issue the attached subpoenas.

Dated: January 5, 2016

Respectfully submitted,

/s/ Geoffrey S. Irwin

Geoffrey S. Irwin
Kerri L. Ruttenberg
Kenneth W. Field
Michael S. Fried

Louis K. Fisher
Tara Lynn R. Zurawski
Douglas E. Litvack

*Counsel for Respondent
Cabell Huntington Hospital, Inc.*

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

In the Matter of

Cabell Huntington Hospital, Inc.
a corporation;

and

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

In the Matter of

Cabell Huntington Hospital, Inc.
a corporation;

and

Pallottine Health Services, Inc.
a corporation;

and

St. Mary's Medical Center, Inc.
a corporation

Docket No. 9366

**[PROPOSED] ORDER ON RESPONDENT'S MOTION FOR ISSUANCE OF A
SUBPOENA DUCES TECUM TO THE WEST VIRGINIA HEALTH CARE
AUTHORITY AND TO ITS CHAIRMAN MR. JAMES PITROLO**

On January 5, 2016, pursuant to Rule 3.36 of the Commission's Rules of Practice, Respondent filed a motion for the issuance of a subpoena duces tecum for the production of documents to the WVHCA and a deposition subpoena to WVHCA Chairman Mr. James Pitrolo. Complaint Counsel does not oppose Respondent's motion.

The requirements of Rule of Practice § 3.36(b) are met. Accordingly, Respondent's motion is **GRANTED**.

ORDERED:

D. Michael Chappell
Chief Administrative Law Judge

Date:

EXHIBIT A



SUBPOENA DUCES TECUM

PUBLIC

Provided by the Secretary of the Federal Trade Commission, and
Issued Pursuant to Commission Rule 3.34(b), 16 C.F.R. § 3.34(b)(2010)

1. TO

2. FROM

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION

This subpoena requires you to produce and permit inspection and copying of designated books, documents (as defined in Rule 3.34(b)), or tangible things, at the date and time specified in Item 5, and at the request of Counsel listed in Item 9, in the proceeding described in Item 6.

3. PLACE OF PRODUCTION

4. MATERIAL WILL BE PRODUCED TO

5. DATE AND TIME OF PRODUCTION

6. SUBJECT OF PROCEEDING

7. MATERIAL TO BE PRODUCED

8. ADMINISTRATIVE LAW JUDGE

9. COUNSEL AND PARTY ISSUING SUBPOENA

Federal Trade Commission
Washington, D.C. 20580

DATE SIGNED

SIGNATURE OF COUNSEL ISSUING SUBPOENA

GENERAL INSTRUCTIONS

APPEARANCE

The delivery of this subpoena to you by any method prescribed by the Commission's Rules of Practice is legal service and may subject you to a penalty imposed by law for failure to comply.

MOTION TO LIMIT OR QUASH

The Commission's Rules of Practice require that any motion to limit or quash this subpoena must comply with Commission Rule 3.34(c), 16 C.F.R. § 3.34(c), and in particular must be filed within the earlier of 10 days after service or the time for compliance. The original and ten copies of the petition must be filed before the Administrative Law Judge and with the Secretary of the Commission, accompanied by an affidavit of service of the document upon counsel listed in Item 9, and upon all other parties prescribed by the Rules of Practice.

TRAVEL EXPENSES

The Commission's Rules of Practice require that fees and mileage be paid by the party that requested your appearance. You should present your claim to counsel listed in Item 9 for payment. If you are permanently or temporarily living somewhere other than the address on this subpoena and it would require excessive travel for you to appear, you must get prior approval from counsel listed in Item 9.

A copy of the Commission's Rules of Practice is available online at <http://bit.ly/FTCRulesofPractice>. Paper copies are available upon request.

This subpoena does not require approval by OMB under the Paperwork Reduction Act of 1995.

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

In the Matter of

Cabell Huntington Hospital, Inc.
a corporation;

and

Pallottine Health Services, Inc.
a corporation;

and

St. Mary's Medical Center, Inc.
a corporation

Docket No. 9366

**RESPONDENT CABELL HUNTINGTON HOSPITAL, INC.'S
SUBPOENA DUCES TECUM ATTACHMENT**

In accordance with the Rules of Practice for Adjudicative Practice (16 C.F.R. 3.1 *et seq.*), Respondent Cabell Huntington Hospital, Inc. requests the following documents and things be produced in accordance with the Definitions and Instructions below, on the date and location indicated in the accompanying *Subpoena Duces Tecum*, or at such other time and place as you and counsel for Respondents Cabell Huntington Hospital shall mutually agree.

I. REQUESTS FOR PRODUCTION

1. All documents responsive to the Federal Trade Commission's Subpoena *Duces Tecum* to the West Virginia Health Care Authority dated December 18, 2015.

2. All documents relating to any internal communications or communications between you, or anyone acting on your behalf, and anyone employed by or acting on behalf of the Federal Trade Commission, relating to the proposed acquisition of St. Mary's Medical Center by Cabell Huntington Hospital., the Federal Trade Commission's investigation of the proposed

acquisition, or *In the Matter of Cabell Huntington Hospital, Pallottine Health Services, Inc. , and St. Mary's Medical Center*, No. 9366 currently pending before the Federal Trade Commission, Office of Administrative Law Judges.

I. DEFINITIONS

These requests incorporate the following definitions and instructions:

1. "You," or "your" shall each mean and refer to the West Virginia Heath Care Authority, its domestic and foreign parents, predecessors, divisions, subsidiaries, affiliates, partnerships and joint ventures, and all directors, officers, employees, agents and representatives of the foregoing. The terms "subsidiary," "affiliate" and "joint venture" refer to any person in which there is partial (25 percent or more) or total ownership or control between the West Virginia Heath Care Authority and any other person.
2. The singular form of a word should be interpreted in the plural, and the plural form of a word shall be interpreted as singular, whenever appropriate, in order to bring within the scope of the request any information that might otherwise be considered beyond its scope. Any pronoun shall be construed to refer to the masculine, feminine, or neutral gender as in each case is most appropriate.
3. The use of the present tense shall be construed to include the past tense, and vice versa, so as to make the request inclusive rather than exclusive.
4. As used herein, "and" and "or" shall be construed conjunctively and disjunctively so as to acquire the broadest meaning possible.
5. As used herein, "any" and "all" shall each be construed to mean "each and every," so as to acquire the broadest meaning possible.
6. The term "communication" means any transmittal of information in the form of facts, ideas, inquiries, or otherwise, including without limitation any transmission of information by one or more persons and/or between two or more persons by any means such as, but not limited to, telephone conversations, voicemails, letters, telegrams, teletypes, telexes, telecopies,

electronic mail, other computer linkups, metadata, written memoranda, and face-to-face conversations, including without limitation, a person(s) seeing or hearing any information by any means and any document memorializing or referring to the contact or communication.

7. “Relate to,” “related to,” and “relating to” shall mean in whole or in part concerning, reflecting, alluding to, mentioning, regarding, discussing, bearing upon, commenting on, constituting, pertaining to, demonstrating, describing, depicting, directly or indirectly relating to, summarizing, containing, embodying, showing, comprising, evidencing, refuting, contradicting, analyzing, identifying, stating, dealing with, and/or supporting.

8. The term “document(s)” is defined broadly and includes all tangible things, all originals (or, if originals are not available, identical copies thereof), all non-identical copies of a document, all drafts of final documents, all other written, printed, or recorded matter of any kind, and all other data compilations from which information can be obtained and translated if necessary, that are or have been in your actual or constructive possession, custody or control, regardless of the medium on which they are produced, reproduced, or stored (including without limitation computer programs and files containing any requested information), and any recording or writing. Any document bearing marks, including without limitation, initials, stamped initials, comments, or notations not a part of the original text or photographic reproduction thereof, is a separate document. The term “document” shall include, without limiting the generality of the foregoing, all electronic mail, letters, voicemails, text messages, correspondence, contracts, agreements, notes to the files, notebooks, reports, memoranda, mechanical and electronic sound records or transcripts thereof, blueprints, flow sheets, formal or informal drawings or diagrams, calendar or diary entries, memora

9. The terms “identify” and “identification,” when used with respect to any natural person, means that the following information shall be provided: The person’s full name; last known home address and telephone number; last known business address and telephone number; last known title or occupation; and last known employer.

10. The terms “identify” and “identification,” when used with respect to any entity (including without limitation corporation, company, firm, partnership, joint venture, association, governmental body or agency or persons other than a natural person), means that the following information shall be provided: The full legal name of the entity; the place of incorporation or organization; the principal place of business; and the nature of the business conducted by that legal entity.

11. The terms “identify” and “identification,” when used with respect to a document, subject to the option to produce records under 16 C.F.R. § 3.35(c), means to provide information sufficient to locate that document, including but not limited to the following: the Bates range, the date appearing on such document or, if no date appears thereon, the approximate date the document was prepared; the identifying code number, file number, title, or label of such document; a general description of such document (e.g., letter, memorandum, drawing); the title or heading; the number of pages of which such document consists; the name of each person who signed or authorized the document; the name of each addressee; the name of each person having possession, custody, or control of such document; if the document existed at one time but does not presently exist, the reason(s) why it no longer exists and the identity of the last person having custody of it; and, if the document is in a foreign language, whether an English translation of the document exists, whether partial or complete.

12. The terms “identify” and “identification” when used with reference to any communication, means that the following information shall be provided: (a) a summary of the communication; (b) the date and place of the communication; (c) each person who was present at, involved in, connected with or who participated in the communication; (d) the form of

communication (e.g., telephone call, meeting, letter,

1. provide sufficient further information concerning the document and circumstances thereof to explain the claim of privilege or immunity and permit the adjudication of the propriety of that claim.
5. If an attorney work product claim is asserted, in addition to the information specified in Instruction 4 above, identify each

10. No information shall be withheld on the asserted grounds that such information therein is not relevant unless (i) the burden of responding is fully described and (ii) persons familiar with the information requested are identified.

11. These requests are submitted for the purpose of discovery and are not to be taken as waiving any objections which may be made at trial or any hearing to the introduction of evidence on subjects covered by these requests or as an admission of the relevance or materiality at trial of any of the matters covered by these requests.

12. If, after responding, you obtain or become aware of any further information responsive to these Requests for Production, you are required to supplement the responses and provide the Respondents with such additional information as required under 16 C.F.R. § 3.31.

13. Where identified documents are not in your possession, custody or control, state

18. No request for production shall be construed with reference to any other request for production for purposes of limitation.

19. Documents that are in paper form or that constitute other physical objects from which recorded information may be visually read, as well as audio or video tapes and similar recordings, shall be produced in their original form or in copies that are exact duplicates of the originals.

20. All documents shall be produced with Bates numbers that shall be unique for each page. Bates numbers shall contain a prefix that can be readily attributed to you. Bates numbering shall be sequential and consist of not less than seven (7) digits with zero fill as necessary to maintain the seven-digit sequence. If a Bates number is skipped, you must provide information identifying and explaining the missing Bates numbers.

21. All documents are to be produced in accordance with any agreements between you and Respondent regarding the production of electronically stored information and any protective order entered by the Court. In the absence of any agreement, all documents shall be produced in the following manner:

- a. All electronically stored documents shall be produced as single-page TIFF Group IV images with an OPT load file; images for individual documents must be contained in a single folder; and extracted or OCR text shall be provided as document level files, in the same folder as the images for the document.
- b. Parent-child relationships (association between an attachment and its parent document) shall be preserved. The attachment(s) shall be produced immediately after the parent document.
- c. Metadata, if available, shall be produced with a DAT load file as follows:
 - (1) For email, the metadata fields will include: Beginning Bates Number, Ending Bates Number, Attachment Beginning Bates, Page Count, Custodian, To, From, CC, BCC, Subject, Date and Time Sent

(MMDDYYYY HH:MM), Date and Time Received (MMDDYYYY HH:MM), and MD5 Hash.

(2) For email attachments, the metadata fields will include: Beginning Bates Number, Ending Bates Number, Title, Author, Page Count, Parent Beginning Bates, Custodian, Creation Date and Time (MMDDYYYY HH:MM), Last Modified Date and Time (MMDDYYYY HH:MM), Size, Location or Path, Original File Name, File Extension, Native DocLink, and MD5 Hash.

(3) For loose files other than email, the metadata fields will include: Beginning Bates Number, Ending Bates Number, Title, Author, Page Count, Custodian, Creation Date and Time (MMDDYYYY HH:MM), Last Modified Date and Time (MMDDYYYY HH:MM), Size, Location or Path, Original File Name, File Extension, Native DocLink, and MD5 Hash.

- d. Excel, Access, and PowerPoint files shall be produced in native format and with a corresponding TIFF Group IV image placeholder and document level extracted text files.
- e. All documents originating in hard copy form shall be produced as TIFF Group IV images with an OPT load file; images for individual documents must be contained in a single folder; and OCR text shall be provided as document level files, in the same folder as the images for the document. To the extent that metadata is available, it shall be produced as set forth in Instruction 21(c)(3) above.

EXHIBIT B

SUBPOENA AD TESTIFICANDUM DEPOSITION

PUBLIC

Provided by the Secretary of the Federal Trade Commission, and
Issued Pursuant to Rule 3.34(a), 16 C.F.R. § 3.34(a) (2010)

1. TO	2. FROM UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION
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This subpoena requires you to appear and give testimony at the taking of a deposition, at the date and time specified in Item 5, and at the request of Counsel listed in Item 8, in the proceeding described in Item 6.

3. PLACE OF DEPOSITION	4. YOUR APPEARANCE WILL BE BEFORE 5. DATE AND TIME OF DEPOSITION
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6. SUBJECT OF PROCEEDING

7. ADMINISTRATIVE LAW JUDGE Federal Trade Commission Washington, D.C. 20580	8. COUNSEL AND PARTY ISSUING SUBPOENA
---	---------------------------------------

DATE SIGNED	SIGNATURE OF COUNSEL ISSUING SUBPOENA
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GENERAL INSTRUCTIONS

APPEARANCE

The delivery of this subpoena to you by any method prescribed by the Commission's Rules of Practice is legal service and may subject you to a penalty imposed by law for failure to comply.

MOTION TO LIMIT OR QUASH

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TRAVEL EXPENSES

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A copy of the Commission's Rules of Practice is available online at <http://bit.ly/FTCRulesofPractice>. Paper copies are available upon request.

This subpoena does not require approval by OMB under the Paperwork Reduction Act of 1995.

CERTIFICATE OF SERVICE

I hereby certify that on January 5, 2016, I filed the foregoing document electronically using the FTC's E-Filing System, which will send notification of such filing to:

Donald S. Clark
Secretary
Federal Trade Commission
600 Pennsylvania Ave., NW, Rm. H-113
Washington, DC 20580

I further certify that I delivered via electronic mail a copy of the foregoing document to:

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

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Notice of Electronic Service

I hereby certify that on January 05, 2016, I filed an electronic copy of the foregoing CHHI's Unopposed Motion

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