

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF IOWA  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	Civil Action No. C94-1023
	)	
vs.	)	Hon. Michael J. Melloy
	)	
MERCY HEALTH SERVICES and	)	<b>UNITED STATES' FIFTH</b>
FINLEY TRI-STATES HEALTH	)	<b>RESPONSE TO DEFENDANTS'</b>
GROUP, INC.,	)	<b>FIRST INTERROGATORIES</b>
	)	
Defendants.	)	

**UNITED STATES' FIFTH RESPONSE TO  
DEFENDANTS' FIRST INTERROGATORIES**

The United States makes the following supplemental response to Defendants' Interrogatory No. 8.

Interrogatory 8:

Identify each person who will or may testify as a non-expert witness in this cause, and, with respect to each person, describe in detail: (a) the general subject matter on which such witness is expected to testify.

Answer:

The United States expects to call the following individuals to testify at trial:

<u>Witness Name</u>	<u>Subject Matter</u>
Schemmel, Scott Paul, M.D. Medical Associates Clinic 100 Langworthy Dubuque, IA 52001 (319) 589-9161	Product market, geographic market, and competitive effects.

Bishop, Thomas  
Chief Operating Officer  
medical Associates Clinic  
100 Langworthy  
Dubuque, IA 52001  
(319) 589-9950

Product market, geographic market,  
competitive effects, and managed  
health care.

Thomson, James K.  
Vice President of Operations  
John Deere Health Care  
Represented by William Zessar  
Vice Pres./Gen. Counsel  
John Deere Health Care  
1515 Fifth Ave., Suite 200  
Moline, IL 61265  
(309)765-1177

Product market, geographic market,  
competitive effects, and managed  
health care.

Van Bell, Richard J.  
President  
John Deere Health Care  
Represented by William Zessar  
Vice Pres./Gen. Counsel  
John Deere Health Care  
1515 Fifth Ave., Suite 200  
Moline, IL 61265  
(309)765-1177

Product market, geographic market,  
competitive effects, and managed  
health care.

The United States may also call the following individuals to  
testify at trial:

<u>Witness Name</u>	<u>Subject Matter</u>
Cremer, Lawrence E. Medical Associates HMO One Cycare Plaza, Suite 230 Dubuque, IA 52001 (319) 556-8070	Product market, geographic market, competitive effects, and managed health care.
Runde, Mark M.D. Medical Associates Clinic 100 Langworthy Dubuque, IA 52001 (319) 589-9890	Product market, geographic market, competitive effects, and managed health care.

Clark, Christopher M.D.  
Medical Associates Clinic  
100 Langworthy  
Dubuque, IA 52001  
(319) 589-9890

Product market, geographic market,  
competitive effects, and managed  
health care.

Guetzko, Gary  
Vice President of Financing  
Mercy Health Center  
Mercy Drive  
Dubuque, IA 52001  
(319) 589-6021

Product market, geographic market,  
competitive effects, managed health  
care, background of Finley & Mercy,  
and promotion of DRHS, as well as  
defendants' claimed efficiencies  
and transfers of money from Mercy  
Health Center to its parents or  
affiliates.

Sister Helen Huewe, O.S.f.  
President/CEO  
Mercy Health Center  
Mercy Drive  
Dubuque, IA 52001  
(319) 589-8000

Product market, geographic market,  
competitive effects, managed health  
care, background of Finley and  
Mercy, and promotion of DRHS.

Kevin Rogols  
President/CEO  
The Finley Hospital  
360 N. Grandview Ave.  
Dubuque, IA 52001  
(319) 589-2413

Product market, geographic market,  
competitive effects, managed health  
care, background of Finley and  
Mercy, and promotion of DRHS.

Terry L. Steele  
Vice Pres./CFO  
The Finley Hospital  
360 N. Grandview Ave.  
Dubuque, IA 52001  
(319) 589-2373

Product market, geographic market,  
competitive effects, managed health  
care, background of Finley and  
Mercy, and promotion of DRHS, as  
well as defendants' claimed  
efficiencies.

Rod Tokheim  
Vice Pres. of Marketing &  
Planning  
The Finley Hospital  
360 N. Grandview Ave.  
Dubuque, IA 52001  
(319) 589-8056

Product market, geographic market,  
competitive effects, managed health  
care, background of Finley and  
Mercy, and promotion of DRHS.

David Shaller  
Administrative Director of  
Medical Staff & Community  
Relations  
The Finley Hospital  
360 N. Grandview Ave.  
Dubuque, IA 52001  
(319) 582-1881

Product market, geographic market,  
competitive effects, managed health  
care, background of Finley and  
Mercy, and promotion of DRHS.

At present, no final decision has been made about which witnesses  
the United States will call.

Dated: August 2, 1994

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Mary Beth McGee  
Eugene D. Cohen  
Jessica N. Cohen

U.S. Department of Justice  
Antitrust Division  
555 4th Street, N.W. Room 9901  
Washington, D.C. 20001  
Tel: (202) 307-1027  
Fax: (202) 514-1517

VERIFICATION

I, Jessica N. Cohen, declare:

1. I am an attorney with the United States Department of Justice, Antitrust Division.

2. I verify that authorized employees and counsel for the United States assembled the facts stated herein; and that the facts herein are true and correct to the best of my knowledge, information, and belief.

3. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Washington, D.C. on \_\_\_\_\_, 1994.

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JESSICA N. COHEN