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Exhibit A

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA
and STATE OF MICHIGAN,

Plaintiffs,

Case No:

v.

2:15-cv-12311

HILLSDALE COMMUNITY HEALTH
CENTER, W.A. FOOTE MEMORIAL
HOSPITAL, D/B/A/ ALLEGIANCE
HEALTH, COMMUNITY HEALTH
CENTER OF BRANCH COUNTY, and
PROMEDICA HEALTH SYSTEM, INC.,
Defendants.

Hon. Judith E. Levy

_____ /

Lansing, Michigan

Tuesday, September 20, 2016

Confidential Video Deposition of:

GEORGIA FOJTASEK,

was called for oral examination by counsel for the
Department of Justice, pursuant to Notice, at Michigan
Department of Attorney General, Corporate Oversight
Division, G. Mennen Williams Building, 525 West Ottawa
Street, Lansing, Michigan, before Michele E. French,
RMR, CRR, CSR-3091 of Veritext, a Notary Public in and
for the State of Michigan, beginning at 9:22 a.m.,
when were present on behalf of the respective parties:

1 local Hillsdale newspaper are, you know, areas
2 where -- okay, great, for whatever.

3 And then there is -- for the services that
4 we both provide, we have made ample use of other
5 sources of media in order to attract patients, which 11:49:54
6 has been successful.

7 BY MS. ROUSE:

8 Q Okay. But so Allegiance's -- Allegiance has
9 a strategy of avoiding marketing competing services in
10 Hillsdale County in certain ways; right? 11:50:17

11 MR. BURNS: Objection as to form.

12 THE WITNESS: We have made specific
13 decisions, for example, on a service, as you are well
14 aware, on the Joint Camp that caused a big reaction,
15 that we weren't going to do billboards or mailers on 11:50:36
16 the Joint Camp, a competing service. So each one that
17 is competing, we evaluate.

18 BY MS. ROUSE:

19 Q And was that your strategy while Mr. Bianchi
20 was CEO of Hillsdale Community Health Center? 11:50:54

21 A It was our strategy -- when Mr. Bianchi was
22 there, it was our strategy. It continues to be our
23 strategy.

24 Q And what is the incident involving an
25 Allegiance orthopedic billboard that angered 11:51:09

CERTIFICATE OF NOTARY

STATE OF MICHIGAN)
) SS
COUNTY OF INGHAM)

I, MICHELE E. FRENCH, a Notary Public in and for the
above county and state, do hereby certify that the
above deposition was taken before me at the time and
place hereinbefore set forth; that the witness was by
me first duly sworn to testify to the truth, and
nothing but the truth; that the foregoing questions
asked and answers made by the witness were duly
recorded by me stenographically and reduced to
computer transcription; that this is a true, full and
correct transcript of my stenographic notes so taken;
and that I am not related to, nor of counsel to either
party nor interested in the event of this cause.

Dated: September 30, 2016

Michelle French

Michele E. French, CSR-3091, RMR, CRR
Notary Public, Ingham County, Michigan
My Commission Expires: December 2, 2017