

Exhibit C-1

UNITED STATES DEPARTMENT OF JUSTICE

ANTITRUST DIVISION

WASHINGTON, D.C. 20530

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IN THE MATTER OF: : Civil Investigative
: Demand Number 27879
MICHIGAN HOSPITAL MARKETING. :
-----:

Lansing, Michigan

Friday, November 14, 2014

Volume 1 of 30(b)(6) Confidential Deposition of:

GEORGIA R. FOJTASEK,

was called for oral examination by counsel for the
Department of Justice, pursuant to Notice, at the
Michigan Department of Attorney General, G. Mennen
Williams Building, 525 West Ottawa Street, 3rd floor
conference room, Lansing, Michigan, before Michele E.
French, RMR, CRR, of Capital Reporting Company, a
Notary Public in and for the State of Michigan,
beginning at 9:07 a.m., when were present on behalf of
the respective parties:

1 P R O C E E D I N G S

2 GEORGIA R. FOJTASEK,

3 was thereupon called as a witness herein, and after
4 having first been duly sworn to testify to the truth,
5 the whole truth and nothing but the truth, was
6 examined and testified as follows:

7 EXAMINATION

8 BY MS. ROUSE:

9 Q Good morning.

10 A Good morning.

11 Q Can you please tell us your full name for
12 the record.

13 A Georgia Ruth Fojtasek.

14 Q And where do you work, Miss Fojtasek?

15 A I live in Jackson, Michigan.

16 Q And where do you work?

17 A At Allegiance Health.

18 Q What's your job title at Allegiance Health?

19 A I'm the President and CEO.

20 Q My name is Katrina Rouse, and I represent
21 the United States, and I'll be taking your deposition
22 today in the morning, and then Mark Gabrielse will
23 take it in the afternoon.

24 I'll let Mark and the other attorneys and
25 economist and paralegal in the room introduce

1 There's a question pending, so then after that we can
2 take a break.

3 MR. BURNS: Thank you.

4 THE WITNESS: Can you repeat?

5 BY MS. ROUSE:

6 Q I'll re-read. So your testimony is that you
7 found out that Allegiance's marketing was agitating
8 Hillsdale through physicians who rotated there and
9 through people who were married and through a local
10 publisher, and you can't recall any other ways that
11 you found out that the marketing was agitating
12 Hillsdale?

13 A I -- you know, I can't -- I can't recall. I
14 have vague recollections of, you know, talking with
15 Chuck around -- you know, I do remember one patient
16 transfer incident. I'm not -- you know, I'm not
17 recalling. I apologize.

18 MS. ROUSE: And can I just follow up on that
19 last --

20 MR. BURNS: Sure.

21 BY MS. ROUSE:

22 Q What do you mean by there was a patient
23 transfer incident?

24 A Well, it was the one that I spoke about
25 earlier, where we had the -- I don't remember, but it

1 was related to, you know, his perception that, you
2 know, a patient had -- that either wanted to go or was
3 supposed to go to Hillsdale came to Allegiance.

4 Q And he communicated his displeasure?

5 A As best I recall.

6 MS. ROUSE: Great. Let's take a break.

7 (Lunch recess - 12:38 p.m. to 1:13 p.m.)

8 BY MS. ROUSE:

9 Q Miss Fojtasek, do you know who the new CEO
10 of Hillsdale is?

11 A Duke Anderson.

12 Q And have you communicated with him before?

13 A I have.

14 Q About how often do you communicate with him?

15 A Maybe, I don't know, two to four times a
16 year, potentially.

17 Q What kinds of things do you communicate with
18 him about?

19 A Well, the biggest thing from our perspective
20 is being able to have our specialists have access to
21 Hillsdale for rotations.

22 Q And which specialists are those? In what
23 service lines?

24 A The ones that are going there -- well, the
25 one that I know for sure is going there now is the

Capital Reporting Company
Fojtasek, Georgia R. (Volume I) (DOJ CONFIDENTIAL) 11-14-2014

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CERTIFICATE OF NOTARY

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3 STATE OF MICHIGAN)
4) SS
5 COUNTY OF INGHAM)

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

19

20 Dated: November 24, 2014


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