

Exhibit C-2

UNITED STATES DEPARTMENT OF JUSTICE
ANTITRUST DIVISION
WASHINGTON, D.C. 20530

IN THE MATTER OF: Civil Investigative

Demand Number 27879

MICHIGAN HOSPITAL MARKETING.

-----/

Lansing, Michigan

Friday, December 12, 2014

Volume 2 of 30(b)(6) Confidential Video Deposition
of:

GEORGIA R. FOJTASEK,

on behalf of Allegiance Health, was called for oral
examination by counsel for the Michigan Department of
Attorney General, pursuant to Notice, at the Michigan
Department of Attorney General, G. Mennen Williams
Building, 525 West Ottawa Street, 7th 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
12:02 p.m., when were present on behalf of the
respective parties:

1 MR. GABRIELSE: Yes, please.

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 (Continued)

8 BY MR. GABRIELSE:

9 Q Good morning, Miss Fojtasek.

10 A Good morning, Mr. Gabrielse.

11 Q Before we get into the questions, I want to
12 remind you of some of the rules or the basic
13 formalities of a deposition that we went over at the
14 beginning last time, that Miss -- Miss Rouse told you.

15 First of all, because we are doing a written
16 record, we need verbal responses.

17 Now, although there's a video today, so
18 sometimes the head shakes will be seen, ultimately,
19 we'd like a good record in the written form, so we
20 need verbal responses. Okay?

21 A Okay.

22 Q And if at some point you say, um-hum, or
23 huh-uh, I may try to correct you or at least confirm
24 what you are saying. Is that a yes? I'm not trying
25 to imply any answer, by any means, but just trying to

1 and market share.

2 Q And I'm not -- I'm not trying to say
3 marketing is the only piece that increases market
4 share. Okay?

5 A Okay.

6 Q What I'm asking is, do you believe marketing
7 does help increase market share?

8 A I do.

9 Q Now, going back to Mr. Gardner, my
10 understanding is he's the Vice President of Marketing
11 and Communications?

12 A Correct.

13 Q Within Allegiance, is there a difference in
14 the Marketing Department and a Communications
15 Department?

16 MR. BURNS: Objection as to form.

17 BY MR. GABRIELSE:

18 Q I guess I'm asking, is there a Marketing
19 Department and then a separate Communications
20 Department?

21 A There's not a -- so what I -- how I would
22 describe our functioning would be that Marketing and
23 Communications are part of the overall package, and
24 the communications piece is to make clear that the --
25 the message that I guess you wouldn't consider

