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# Exhibit C-2

### 5:15-cv-12311-JEL-DRG Doe #73-4 Reporting 2 of 5 Pg ID 1226 Fojtasek, Georgia R. (Volume II) (DOJ CONFIDENTIAL) 12-12-2014

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: 229

### 5:15-cv-12311-JEL-DRG Doe #73-4 Reporting Company 3 of 5 Pg ID 1227 Fojtasek, Georgia R. (Volume II) (DOJ CONFIDENTIAL) 12-12-2014

1 MR. GABRIELSE: Yes, please. 2 GEORGIA R. FOJTASEK, 3 was thereupon called as a witness herein, and after having first been duly sworn to testify to the truth, 4 5 the whole truth and nothing but the truth, was examined and testified as follows: 6 7 EXAMINATION (Continued) BY MR. GABRIELSE: 8 9 Q Good morning, Miss Fojtasek. 10 Α Good morning, Mr. Gabrielse. 11 0 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. First of all, because we are doing a written 15 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 Α Okay. 22 And if at some point you say, um-hum, or 0 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

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#### 5:15-cv-12311-JEL-DRG Doe #73-4 Reporting Company 4 of 5 Pg ID 1228 Fojtasek, Georgia R. (Volume II) (DOJ CONFIDENTIAL) 12-12-2014

and market share. 1 2 Ο And I'm not -- I'm not trying to say marketing is the only piece that increases market 3 share. Okay? 4 5 Α Okay. What I'm asking is, do you believe marketing 6 Q 7 does help increase market share? 8 Α I do. 9 Q Now, going back to Mr. Gardner, my understanding is he's the Vice President of Marketing 10 11 and Communications? 12 А Correct. Within Allegiance, is there a difference in 13 Q the Marketing Department and a Communications 14 15 Department? 16 MR. BURNS: Objection as to form. BY MR. GABRIELSE: 17 18 Q I guess I'm asking, is there a Marketing 19 Department and then a separate Communications 20 Department? 21 А 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 -the message that I guess you wouldn't consider 25

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Capital Reporting Company Fojtasek, Georgia R. (DOJ CONFIDENTIAL) 12-12-2014

1	CERTIFICATE OF NOTARY
2	
3	STATE OF MICHIGAN )
4	) SS COUNTY OF INGHAM )
5	
6	I, MICHELE E. FRENCH, a Notary Public in and for the
7	above county and state, do hereby certify that the
8	above deposition was taken before me at the time and
9	place hereinbefore set forth; that the witness was by
10	me first duly sworn to testify to the truth, and
11	nothing but the truth; that the foregoing questions
12	asked and answers made by the witness were duly
13	recorded by me stenographically and reduced to
14	computer transcription; that this is a true, full and
15	correct transcript of my stenographic notes so taken;
16	and that I am not related to, nor of counsel to either
17	party nor interested in the event of this cause.
18	
19	Dated: December 24, 2014
20	
21	
22	11 Cat 1
23	Micelerrenell
24	Michele E. French, CSR-3091, RMR, CRR Notary Public, Ingham County, Michigan
25	My Commission Expires: December 2, 2017
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