Exhibit G-2

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA and
STATE OF MICHIGAN,
Plaintiffs,
-vs- Case No. 15-CV-12311
HILLSDALE COMMUNITY HEALTH CENTER,
WA FOOTE MEMORIAL HOSPITAL, et al,
Defendants.
_____/

VIDEOTAPED DEPOSITION
CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

DEPONENT: DUKE ANDERSON - VOLUME II
DATE: Friday, July 1, 2016
TIME: 8:56 a.m.
LOCATION: DICKINSON WRIGHT, PLLC
350 South Main Street, Suite 300
Ann Arbor, Michigan
REPORTER: Karen Fortna, CRR/RMR/RPR/CSR-5067
VIDEO: Jane McMillan
JOB NO: 2777

1 Friday, July 1, 2016
2 Ann Arbor, Michigan
3 8:56 a.m.
4 * * *
5 VIDEOGRAPHER: We are now on the record.
6 The time is 8:56 a.m. on Friday, July 1, 2016, for
7 the deposition of Duke Anderson. We are taking
8 this deposition at 350 South Main, Ann Arbor,
9 Michigan, in the action entitled United States of
10 America versus Hillsdale Community Health. This is
11 Case No. 15-CV-12311.
12 My name is Jane McMillan and I'm a
13 certified legal video specialist from Fortz Legal
14 Support, LLC.
15 Will the court reporter please swear in
16 the witness and the attorneys briefly identify
17 themselves for the record.
18 * * * *
19 DUKE ANDERSON,
20 having first been duly sworn, was examined and
21 testified as follows:
22 MR. GABREILSE: Good morning,
23 Mr. Anderson. Mike Gabrielse with the Michigan
24 Attorney General's Office.
25 MS. ROUSE: Katrina Rouse with the United

1 BY MR. GABRIELSE:
2 Q. Well, do you think Allegiance's advertising could
3 impact the relationship between Allegiance and
4 Hillsdale doctors?
5 A. I don't think so.
6 Q. Not at all?
7 A. Not to a large degree.
8 Q. What about the instance with Dr. Collins; was that
9 Allegiance advertising?
10 A. Yes.
11 Q. Do you think that impacted the relationship between
12 Allegiance and Dr. Collins?
13 A. It doesn't sound like ultimately that it did.
14 Q. Was Dr. Collins pretty upset?
15 A. I heard he was.
16 Q. So if I understand this correctly, you are of the
17 opinion that Allegiance marketing in Hillsdale
18 County does not impact Allegiance's relationship
19 with Hillsdale doctors?
20 A. I think I would say that, yes.
21 Q. So you never discussed with Allegiance that they
22 should only market higher acuity services in
23 Hillsdale?
24 A. I don't believe so.
25 Q. Did you ever ask Allegiance not to market certain

1 things to Hillsdale doctors because Hillsdale
2 doctors provided those services?
3 A. We talked about an instance where Allegiance called
4 me to inquire with the general surgeons yesterday
5 about a procedure. I went to Dr. McCririe, who is
6 the one of the general surgeons, and I asked about
7 the procedure -- which I've got to confess, I don't
8 even know what the procedure is -- and Dr. McCririe
9 said, "We can do that," so I went back and said, "I
10 think we have that handled; Dr. McCririe said
11 there's not a lot of that down in Hillsdale."
12 Q. So is that a yes or no to the question, did you
13 ever ask Allegiance not to market certain things to
14 Hillsdale doctors because Hillsdale doctors
15 provided those services?
16 A. In that instance, yes.
17 Q. Have you done that with any other healthcare
18 providers?
19 A. No.
20 Q. So you were just talking about the document.
21 If you can pull out Exhibit 18.
22 A. Okay.
23 Q. Looking at that first email from Mr. Houttekier to
24 you on the very bottom of the page. First in time,
25 I'm sorry. A little confusing. First in time on

1 the bottom of the page from Mr. Houttekier to you.
2 A. Yes.
3 Q. It talks about Dr. Obi is performing minimally
4 invasive parathyroid surgery by using a PTH assay
5 machine. Do you see that?
6 A. Yes.
7 Q. Did -- at the time this email was sent, did
8 Hillsdale Hospital have one of these PTH assay
9 machines?
10 A. I wouldn't even know what that is.
11 Q. Do you know -- are there different methods of
12 performing minimally invasive parathyroid surgery?
13 A. I don't even know what that is.
14 Q. Are there different ways to perform parathyroid
15 surgery?
16 A. I don't know what that is.
17 Q. Now if this was a new way to perform this surgery
18 by using this machine, do you think that would be
19 important for Hillsdale doctors who will be
20 referring patients to have this surgery know about?
21 A. Possibly if the general surgeons thought that was a
22 good route to go.
23 Q. If -- do you think it's important that a referring
24 patient know about all the different options of how
25 a surgery could be performed?

1 A. So they could make an informed decision, yes.
2 Q. And do you know which doctors perform what type of
3 surgery?
4 A. Yes.
5 Q. And would you agree that a minimally invasive
6 surgery might well be preferable to a non-minimally
7 invasive surgery?
8 A. In most cases, definitely yes.
9 Q. So if, at the time of this email, Hillsdale
10 Hospital was not performing minimally invasive
11 parathyroid surgery, do you think it would be
12 important for these Hillsdale doctors to know that
13 a minimally invasive parathyroid surgery was
14 offered by Dr. Obi at Allegiance?
15 A. That might be of value.
16 Q. But you requested this information not be provided
17 to Hillsdale doctors?
18 A. Yes, I did.
19 Q. So pull out Exhibit 2.
20 A. Okay.
21 Q. If you look at the second page of the document, and
22 then with the column on the left, Mr. Burns had
23 talked to you about "agreements to deprive
24 patients, physicians and employers of information
25 they otherwise would have had when making important

STATE OF MICHIGAN)

COUNTY OF OAKLAND)

Certificate of Notary Public

I do hereby certify the witness, whose attached testimony was taken in the above matter, was first duly sworn to tell the truth; the testimony contained herein was reduced to writing in the presence of the witness, by means of stenography; afterwards transcribed; and is a true and complete transcript of the testimony given. I further certify that I am not connected by blood or marriage with any of the parties, their attorneys or agents, and that I am not interested directly, indirectly or financially in the matter of controversy.

In witness whereof, I have hereunto set my hand this day at Royal Oak, Michigan, State of Michigan.

I hereby set my hand this day, July 5, 2016.

Karen Fortna

Karen Fortna, CRR/RMR/RPR/CSR-5067
Notary Public, Oakland County, Michigan
My Commission expires 4/30/2019