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Exhibit I

1 UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF MICHIGAN
3

4 UNITED STATES OF AMERICA
and STATE OF MICHIGAN,

5 Plaintiffs,

Case No:

6 v.

2:15-cv-12311

7 HILLSDALE COMMUNITY HEALTH
8 CENTER, W.A. FOOTE MEMORIAL Hon. Judith E. Levy
HOSPITAL, D/B/A/ ALLEGIANCE
9 HEALTH, COMMUNITY HEALTH
CENTER OF BRANCH COUNTY, and
10 PROMEDICA HEALTH SYSTEM, INC.,
11 Defendants.

12 _____/
13 La Grange, Illinois

14 Thursday, December 8, 2016
15

16 Confidential Video Deposition of:

17 LAWRENCE W. MARGOLIS,
18 was called for oral examination by counsel for the
19 Department of Justice, pursuant to Notice, at SPM
20 Marketing & Communications, 15 West Harris Avenue,
21 Suite 300, La Grange, Illinois, 60525, before Michele
22 E. French, RMR, CRR, CSR-3091 of Veritext Legal
23 Solutions, a Notary Public in and for the State of
24 Michigan, beginning at 9:00 a.m., when were present on
25 behalf of the respective parties:

1 MR. BURNS: James Burns, for Defendant

2 Allegiance Health.

3 THE VIDEOGRAPHER: The court reporter is

4 Michele French.

5 Michele, will you please swear in the 09:02:36

6 witness.

7 LAWRENCE W. MARGOLIS,

8 was thereupon called as a witness herein, and after

9 having first been duly sworn to testify to the truth,

10 the whole truth and nothing but the truth, was 09:02:39

11 examined and testified as follows:

12 THE VIDEOGRAPHER: Please proceed.

13 EXAMINATION

14 BY MR. LISKEY:

15 Q Good morning. 09:02:48

16 A Good morning.

17 Q Can you please tell us your full name for
18 the record.

19 A Lawrence W. Margolis.

20 Q Do you understand that you're testifying 09:02:52
21 under oath today?

22 A Yes, I do.

23 Q Do you understand that your answers today
24 must be truthful?

25 A Yes. 09:02:58

1 ones.

2 BY MR. LISKEY:

3 Q Are the benefits you described true for each
4 type of media?

5 MR. BURNS: Objection as to form. 09:28:55

6 THE WITNESS: No. Certain media does
7 certain things based on the -- on what it -- what it
8 is it's providing. So collectively they might do
9 that, but not each one individually would provide all
10 three of those things that I mentioned. 09:29:11

11 BY MR. LISKEY:

12 Q Would any media, any particular type of
13 media, provide all three benefits?

14 A Well, the best way to describe that would be
15 an example. If I -- if I -- if I'm referring you 09:29:26
16 to -- if I'm providing you education and say, for more
17 information go to the website, then I'm not doing it
18 all within the context of that particular piece of
19 material, but I'm giving you an opportunity to go to
20 and do something else that would provide you even 09:29:48
21 more.

22 Q Are hospital marketing strategies generally
23 aimed at driving patient volume?

24 A That's a primary reason why people -- why
25 hospitals market, to -- for acquisition. In some 09:30:07

1 cases it's simply to build awareness. We've had --
2 I've worked with some clients that sufficiently have
3 the volume that they believe is necessary at that time
4 but don't want to stay out of the market, want to make
5 sure that there is some -- just simply brand 09:30:29
6 awareness, or they're trying to build image.

7 One may do it for donation. You know, we're
8 looking for donors. So if we look at St. Jude's, that
9 we're all familiar with, that runs during
10 Thanksgiving, they're doing it simply to raise -- 09:30:49
11 raise dollars, so that would be another reason.

12 Q For clients that come to you looking to
13 either build or maintain brand awareness, which media
14 would you typically advise them to pursue?

15 A It would -- I would tell you that it would 09:31:13
16 depend on the particular market that they're in and
17 the availability of media. For simply broad range
18 awareness, TV would be -- would certainly be one that
19 would be significantly used and -- and depending on
20 the radio market, radio might be another good area to 09:31:43
21 do that.

22 Q Is marketing a tool hospitals use to compete
23 with each other?

24 MR. BURNS: Objection as to form.

25 THE WITNESS: Is it a -- is marketing a tool 09:31:53

1 that hospitals use to compete? Yes.

2 BY MR. LISKEY:

3 Q Do you think it's an important tool for
4 competing?

5 A I think it's one of the tools. 09:32:05

6 Q What do you tell your clients about the
7 importance of marketing and competing?

8 A I -- I think it would be -- I would state it
9 in a different way. I would state that our clients
10 come to us, based on certain goals and objectives, and 09:32:34
11 we help them determine how marketing might help them
12 achieve those marketing and -- those objectives. And
13 so it would be one of the -- one of the tools that
14 they could use to compete effectively.

15 Q Is marketing intended to inform and educate 09:32:54
16 future patients?

17 A It's used to inform and potentially educate,
18 yes.

19 Q In what ways?

20 A Inform -- as I've stated previously, it's to 09:33:16
21 inform them of -- in the case of a hospital or health
22 system, it would be used to inform them of the fact
23 that they treat -- diagnose and treat that disease.
24 It would inform them about potential services that
25 they offered in that particular -- in that particular 09:33:37

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: December 20, 2016



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