

# Exhibit B

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

IN THE MATTER OF: Civil Investigative  
Demand Number 27879

MICHIGAN HOSPITAL MARKETING.

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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 the strategy you've described?

2 A I believe it would tick off the orthopedic  
3 surgeons there and potentially risk not only referrals  
4 but the viability of our hand clinic.

5 Q So does that mean you think it would be  
6 contrary to the strategy you've described?

7 A Yes.

8 Q Have you ever asked Mr. Anderson whether the  
9 orthopedic surgeons in Hillsdale would be ticked off  
10 from Dr. Ekpo speaking in Hillsdale?

11 A I don't recall that I've asked him that.

12 Q So you recall having this conversation with  
13 Mr. Gardner about Ekpo speaking in Hillsdale, but you  
14 don't recall a conversation with Mr. Anderson about  
15 whether Dr. Ekpo could?

16 MR. BURNS: Objection as to form.

17 THE WITNESS: I don't recall that, no.

18 BY MR. GABRIELSE:

19 Q During that conversation with Mr. Gardner,  
20 did you tell him that he should check with  
21 Mr. Anderson of whether it might be viable?

22 A I don't -- I don't recall that, no.

23 Q Is there a reason -- strike that.

24 Would you like to know whether the  
25 orthopedic surgeons would object to Dr. Ekpo speaking

1 in Hillsdale?

2 MR. BURNS: Objection as to form.

3 THE WITNESS: You know, my perspective is  
4 beyond that. I have a long history with Hillsdale. I  
5 know what our strategy is, and I don't -- I don't need  
6 to go find out the specifics. And there's enough  
7 history of them getting whipped up, ticked off. And  
8 we have a strategy that's working. We're building  
9 market share in that area.

10 BY MR. GABRIELSE:

11 Q How do you know you're building market share  
12 in that area?

13 A We have Market Share Reports.

14 Q When is the last time you've revisited this  
15 strategy towards Hillsdale?

16 A Can you clarify what you mean "revisited"?

17 Q Considered whether it was effective.

18 A Well, we get the -- every six months,  
19 generally, a Market Share Report, and then --

20 Q Who is "we"?

21 A So the Executive Team --

22 Q Okay.

23 A -- as we look at our balanced scorecard  
24 progress. And...there was a thought that just went  
25 through my mind.

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

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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 24, 2014

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