

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF IOWA
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	Civil Action No. C94-1023
)	
vs.)	Hon. Michael J. Melloy
)	
MERCY HEALTH SERVICES and)	UNITED STATES' FOURTH
FINLEY TRI-STATES HEALTH)	RESPONSE TO DEFENDANTS'
GROUP, INC.,)	FIRST INTERROGATORIES
)	
Defendants.)	
)	

**UNITED STATES' FOURTH RESPONSE TO
DEFENDANTS' FIRST INTERROGATORIES**

The United States makes the following supplemental response to Defendants' Interrogatory No. 8.

Interrogatory 8:

Identify each person who will or may testify as a non-expert witness in this cause, and, with respect to each person, describe in detail: (a) the general subject matter on which such witness is expected to testify.

Answer:

The United States expects to call the following individuals to testify at trial (three of whom were previously indicated as "may call" witnesses in plaintiff's Response of June 29):

<u>Witness Name</u>	<u>Subject Matter</u>
Schemmel, Scott Paul, M.D. Medical Associates Clinic 100 Langworthy Dubuque, IA 52001 (319) 589-9161	Product market, geographic market and competitive effects.

Bishop, Thomas
Chief Operating Officer
Medical Associates Clinic
100 Langworthy
Dubuque, IA 52001
(319) 589-9950

Product market, geographic
market, competitive
effects and managed
healthcare.

Thomson, James K.
Vice-President of Operations
John Deere Health Care
Represented by William Zessar
Vice President/Gen. Counsel
John Deere Health Care
1515 Fifth Ave., Ste. 200
Moline, IL 61265
(309) 765-1177

Product market, geographic
market, competitive
effects and managed
healthcare.

Van Bell, Richard J.
President
John Deere Health Care
Represented by William Zessar
Vice President/Gen. Counsel
John Deere Health Care
1515 Fifth Ave., Ste. 200
Moline, IL 61265
(309) 765-1177

Product market, geographic
market, competitive
effects and managed
healthcare.

The United States may also call the following individuals to testify at trial (one of whom was previously indicated in plaintiff's June 29 response):

<u>Witness Name</u>	<u>Subject Matter</u>
Cremer, Lawrence E. Medical Associates, HMO One Cycare Plaza, Ste. 230 Dubuque, IA 52001 (319) 556-8070	Product market, geographic market, competitive effects and managed healthcare.
Runde, Mark, M.D. Medical Associates Clinic 100 Langworthy Dubuque, IA 52001 (319) 589-9890	Product market, geographic market, competitive effects.

Clark, Christopher, M.D.
Medical Associates Clinic
100 Langworthy
Dubuque, IA 52001
(319) 589-9821

Product market, geographic
market, competitive
effects.

At present, no final decision has been made about which witnesses
the United States will call.

Dated: July 15, 1994

Mary Beth McGee
Eugene D. Cohen
Richard S. Martin
Jesse M. Caplan
Ann Lea Harding

U.S. Department of Justice
Antitrust Division
555 4th Street, N.W. Room 9421
Washington, D.C. 20001
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VERIFICATION

I, Mary Beth McGee, declare:

1. I am an attorney with the United States Department of Justice, Antitrust Division.

2. I verify that authorized employees and counsel for the United States assembled the facts stated herein; and that the facts herein are true and correct to the best of my knowledge, information, and belief.

3. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Washington, D.C. on _____, 1994.

MARY BETH MCGEE