

EXHIBIT 3

Plaintiffs' Opposition to Defendant's Motion for
Judgment on The Pleadings

UNITED STATES DEPARTMENT OF JUSTICE
ANTITRUST DIVISION
Civil Investigation Demand Number 28097

In Re:

Carolinas HealthCare System

ORAL INVESTIGATIVE TESTIMONY OF

CAROL LOVIN

Charlotte, North Carolina

Friday, June 19, 2015

8:13 a.m.

Reported by:

APRIL REID, RPR, CRR, CLR
Job No. 39217

1 is dated 4/30/14. But I have seen similar versions.

2 I can't tell you I've seen exactly this one.

3 Q. So there may be newer versions of the org
4 chart?

5 A. Yes, there may be newer versions.

6 Q. Well, I would like to go through some of
7 the org chart. To the extent that there are
8 differences, if you could point them out maybe for
9 me.

10 I'd like to start off, who do you report
11 to, Ms. Lovin?

12 A. I report to Michael Tarwater.

13 Q. How long have you reported to Mr.
14 Tarwater?

15 A. I am pretty sure this is accurate. I
16 started reporting to Mr. Tarwater -- if this is mid
17 2015, it would be January 2014, I believe.

18 Q. Who did you report to before that?

19 A. I reported to Russ Guerin.

20 Q. Who is Russ Guerin?

21 A. Russ Guerin is no longer with Carolinas
22 Healthcare System. At the time he was one of the
23 executive vice presidents.

24 Q. What was Russ Guerin's job title when you
25 reported to him?

1 Planning and Communications. At the time in 2014
2 that's likely what it was called. But this is the
3 organizational chart that -- people who report
4 directly to me at that time.

5 Q. Has the name of this group changed?

6 A. You know, that's an interesting question.
7 I don't know what the correct version of this shows.
8 We refer to ourselves as Strategic Services.

9 Q. So the name Planning and Communications
10 has changed to Strategic Services?

11 A. It is what our team in the organization
12 refers to us as. I don't know if this document --
13 if you pulled it up today, with today's date, still
14 has that.

15 Q. Okay. And let's take a step back from
16 the document.

17 Can you just describe for me what your
18 responsibilities are as the Chief Strategy Officer?

19 A. My responsibilities are first and
20 foremost for the development, deployment of
21 strategy. Working with our executive team, other
22 leaders, physicians, anyone in the organization
23 because strategy is not a one person's job. I have
24 operational responsibility for four teams that are
25 reflected on this page.

1 between development and deployment when it comes to
2 strategy?

3 A. Development is the actual articulation of
4 -- of our strategy. And we need to talk about what
5 that term means if we go much further because people
6 use that term differently.

7 And deployment, it would be the execution
8 or the actions based on -- you know, to get you --
9 to do it, to get you to where you want to go.

10 Q. Okay. Let's talk about what strategy
11 means more in a moment. I just want to make sure I
12 understand your team.

13 A. Sure.

14 Q. How big is the CHS Management Company?

15 A. The CHS Management Company is
16 approximately 45 people.

17 Q. So, in total, about how many people
18 report to you or are under you?

19 A. Are under me, approximately 300.

20 Q. And briefly tell me about your level of
21 communication with Mr. Tarwater. How often do you
22 meet with him?

23 A. As his direct report, I meet with him
24 every other week. Sometimes I have a standing every
25 other week. Sometimes the calendars get off and I