Kimbell David Gourley, ISB #3578
E-Mail: kgourley@idalaw.com
Jones Gledhill Fuhrman Gourley, P.A.
225 North 9th Street, Suite 820
Boise, Idaho 83702
Telephone: (208) 331-1170
Fax: (208) 331-1529

Attorneys for Idaho Physicians Network, Inc.

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF IDAHO

SAINT ALPHONSUS MEDICAL CENTER, et al. Plaintiffs, v. ST. LUKE'S HEALTH SYSTEM, LTD. AND ST. LUKE'S REGIONAL MEDICAL CENTER, LTD. Defendants.	Case No.: 1:12-CV-00560-BLW (Lead case) **RESPONSE TO GOVERNMENT PLAINTIFFS' MOTION REGARDING IMPLEMENTATION OF COURT'S JULY 3, 2014, ORDER BY IDAHO PHYSICIANS NETWORK (DKT. 513)**
FEDERAL TRADE COMMISSION; STATE OF IDAHO, Plaintiffs, v. ST. LUKE'S HEALTH SYSTEMS, LTD.; SALTZER MEDICAL GROUP, P.A., Defendants.	No. 1:13-cv-0116-BLW

COMES NOW Idaho Physician's Network, Inc. ("IPN"), by and through its counsel of record, Jones • Gledhill • Fuhrman • Gourley, P.A., and hereby responds to the Government

Plaintiffs' Motion Regarding Implementation of Court's July 3, 2014, Order concerning attorneys eyes only designations (Docket #513) as follows:

1. Trial Exhibit 2214 was produced by IPN and designated "AEO" because it contains confidential and proprietary fee schedule information.

2. Specifically, Exhibit 2214 is a July 30, 2012, IPN Fee Schedule update from IPN's president and executive director to IPN's participating providers. The fee schedule then sets forth specific reimbursements relating to CPT codes and various facilities.

3. IPN considers Exhibit 2214 to be highly confidential and it contains information that has not been circulated in or released to the public; and

4. IPN is not a party to this lawsuit and produced documents and testified pursuant to subpoenas issued by the respective parties. The unsealing of Exhibit 2214 would be highly prejudicial to IPN, and IPN thus respectfully requests that the "AEO" designation continue and the document continue to be sealed from public disclosure.

WHEREFORE, IPN respectfully requests that the court permit Trial Exhibit 2214 to continue to remain with the "AEO" designation and to be sealed from public disclosure.

DATED this 31st day of July, 2014.

JONES • GLEDHILL • FUHRMAN • GOURLEY, P.A.

By: _____

Jones • Gledhill • Fuhrman • Gourley, P.A.
P.O. Box 1097
Boise, ID 83701
Telephone: (208) 331-1170
kgourley@idalaw.com

CERTIFICATE OF SERVICE

I hereby certify that on July 31st, 2014, the foregoing RESPONSE TO GOVERNMENT PLAINTIFFS' MOTION REGARDING IMPLEMENTATION OF COURT'S 7/3/2014 ORDER **was** served electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means:

Keely E. Duke Esq
ked@dukescanlan.com

Eric J. Wilson Esq
eqilson@gklaw.com

Wendy K. Arends Esq
warends@gklaw.com

Tacy F. Flint Esq.
tflint@sidley.com

Ben J. Keith Esq.
bkeith@sidley.com

Jessica S. Rothenberg Esq.
jrothenberg@sidley.com

Bryan A. Nickels Esq.
ban@dukescanlan.com

Kevin J. Scanlan Esq.
kjs@dukescanlan.com

Raymond D. Powers Esq.
rdp@powerstolman.com

Portia L. Rauer Esq
plr@powerstolman.com

Matthew Paul Accornero Esq
maccornero@ftc.gov

Sara Marie Berry Esq
smberry@stoel.com

J. Walter Sinclair Esq
jwsinclair@stoel.com

Jack R. Bierig Esq
jbierig@sidley.com

David A. Ettinger Esq.
dettinger@honigman.com

Lara Fetsco Phillip Esq.
lara.phillip@honigman.com

Charles K. Schafer Esq.
cschafer@sidley.com

Scott D. Stein Esq.
sstein@sidley.com

Brian K. Julian Esq
bjulian@ajhlaw.com

Brett T. DeLange Esq
brett.deland@ag.idaho.gov

Colleen D. Zahn Esq
colleen.zahn@ag.idaho.gov

Carl J. Withroe Esq
carl.withroe@ag.idaho.gov

J. Thomas Greene Esq
tgreene2@ftc.gov

Peter C. Herrick Esq
pherrick@ftc.gov

Danica Noble Esq
dnoble@ftc.gov

Robert J. Schroeder Esq
rschroeder@ftc.gov

Syrena Case Hargrove Esq
Syrena.Hargrove@usdog.gov

Neil D. McFeeley Esq
nmcfeeley@eberle.com

Kevin J. O'Connor Esq
koconnor@kglaw.com

Douglas Eugene Litvack Esq
dlitvack@ftc.gov

Michael James Perry Esq
mperry@ftc.gov

Henry Chao-Lon Su Esq
hus@ftc.gov

Samuel Andrew Diddle Esq
sdiddle@everle.com

Jack Alan Rovner Esq
jrovner@hlconsultancy.com

Kimbell D. Gourley
Of Attorneys for Idaho Physicians Network, Inc.