

**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

<p>COMMONWEALTH OF PENNSYLVANIA, By JOSHUA D. SHAPIRO, Attorney General; PENNSYLVANIA DEPARTMENT OF INSURANCE, By JESSICA ALTMAN, Insurance Commissioner, and PENNSYLVANIA DEPARTMENT OF HEALTH, By DR. RACHEL LEVINE, Secretary of Health;</p> <p style="text-align: center;">Petitioners,</p> <p style="text-align: center;">v.</p> <p>UPMC, A Nonprofit Corp., et al.;</p> <p style="text-align: center;">Respondents.</p>	<p>No. 334 M.D. 2014</p>
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**RESPONDENT UPMC'S WITNESS LIST**

Pursuant to the Court's Order of June 3, 2019, Respondent UPMC discloses the following witnesses that it will or may call during the June 10-11 hearing in the above referenced matter:

<b>Name</b>	<b>Summary of Anticipated Testimony</b>
<p>W. Thomas McGough, Jr. <i>UPMC Executive Vice President and Chief Legal Officer</i></p>	<p>Mr. McGough negotiated and signed the UPMC Consent Decree on behalf of UPMC and is expected to testify as to the circumstances leading to negotiation of the Consent Decree, including the UPMC-Highmark relationship between approximately 2010-2014; negotiation of the Consent Decree; the parties' relevant course of dealing and/or performance; implementation of the Consent Decree(s); disputes arising under the Consent</p>

Name	Summary of Anticipated Testimony
	Decree(s); and communications from the other parties regarding the Consent Decree(s).
Michael F. Consedine <i>Former Insurance Commissioner of Pennsylvania</i>	Mr. Consedine negotiated and signed the UPMC Consent Decree on behalf of the Commonwealth and is expected to testify as to the circumstances leading to negotiation of the Consent Decree; negotiation of the Consent Decree; and communications or lack thereof regarding the termination and modification provisions of the Consent Decree.
James D. Schultz <i>Former General Counsel, Commonwealth of Pennsylvania</i>	Mr. Schultz negotiated and signed the UPMC Consent Decree on behalf of the Commonwealth and is expected to testify as to the circumstances leading to negotiation of the Consent Decree; negotiation of the Consent Decree; and communications or lack thereof regarding the termination and modification provisions of the Consent Decree.

UPMC has prepared this disclosure in good faith based on the information reasonably available to it in light of the expedited nature of this proceeding.

UPMC reserves the right to amend and/or supplement both the list of witnesses and the summaries of anticipated testimony provided herein based on newly discovered information and, if necessary, will supplement this disclosure as soon as practicable.

Respectfully submitted,

/s/ Stephen A. Cozen

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Dated: June 6, 2019

*Attorneys for Respondent UPMC*

**CERTIFICATE OF COMPLIANCE WITH PUBLIC ACCESS POLICY**

I certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.

*/s/ Stephen A. Cozen*  
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*Attorney for UPMC*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 6th day of June, 2019, a true and correct copy of Respondent UPMC's Witness List was served upon counsel of record via the Court's electronic filing system and via email, which service satisfies the requirements of Pa. R.A.P. 121:

*/s/ Stephen A. Cozen*  
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*Attorney for UPMC*