

[REDACTED]

June 17, 1999

HAND DELIVERY

Richard B. Smith  
Deputy Assistant Director  
Premerger Notification Office  
Federal Trade Commission  
Room H-323  
6<sup>th</sup> and Pennsylvania Avenue, N.W.  
Washington, DC 20580

1999 JUN 17 P 3:07

FEDERAL TRADE  
COMMISSION  
PREMERGER NOTIFICATION  
OFFICE

Dear Mr. Smith:

This is to confirm our conversation yesterday regarding my client's participation in an acquisition upon which you received a letter dated June 10, 1999 from [REDACTED] of [REDACTED]

In that letter, Mr. [REDACTED] stated that he represented a hospital which was going to purchase property from another hospital. Prior to the closing, the seller hospital will strip from its buildings all income producing assets, as explained in Mr. [REDACTED] letter. You confirmed in our conversation that you agreed with Mr. [REDACTED] letter that the acquisition by his hospital client was exempt as a purchase of unproductive real property under Section 802.2(c) of the Hart Scott-Rodino rules.

The property being sold consists of several buildings. Mr. [REDACTED] hospital client will purchase a portion of the property. My client will purchase the rest of the property, which it plans to convert to residences. The portion of the property purchased by my client also will be stripped of income producing assets prior to the closing.

In our conversation you confirmed that my client's acquisition also is exempt from a Hart-Scott-Rodino filing as the purchase of unproductive real property under section 802.2(c).

[REDACTED]

Richard B. Smith  
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Please let me know within three (3) days of your receipt of this letter if you disagree with the above.

Thank you very much.

Sincerely,

A large black rectangular redaction covering the signature and name of the sender.A short black rectangular redaction mark.

Enclosure:  letter

cc: 

A long black rectangular redaction mark.A large, irregular black redaction covering several lines of text at the bottom of the page.