



RICHARDSON PATRICK
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September 5, 2007

VIA FIRST CLASS MAIL AND EMAIL

Eric Rothschild, Esquire
Pepper Hamilton LLP
3000 Two Logan Square
Eighteenth and Arch Streets
Philadelphia, PA 19103-2799

Re: State of Alaska v. Eli Lilly and Company
Case No.: 3AN-06-5630CIV

Dear Eric:

Please find enclosed a list of available data fields from the Medicaid claims database, Bates numbered ZYP-AK-03354 to ZYP-AK-03360.

With kindest regards, I remain,

Sincerely yours,

Christiaan Marcum

cc: Matthew L. Garretson, Esq.
Joseph W. Steele, Esq.
Eric T. Sanders, Esq.
David Suggs, Esq.

Daniel M. Bradley
James C. Bradley
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Edward J. Westbrook
Kenneth J. Wilson
Robert S. Wood
Walter McBrayer Wood

Of Counsel:
James H. Rios, Jr.
David L. Suggs (OH & PA only)

EXHIBIT F
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001440
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MACRO CPHIST		FILE CPHIST	
H-ICN	1	7	P HEADING ('CCN')
H-JULIAN	1	2	P HEADING ('JULIAN')
H-INVOICE-TYPE	8	2	N HEADING ('INV' 'TYP')
H-CLAIM-CDE	10	3	N
H-CLAIM-TYP	10	2	N HEADING ('CLM' 'TYP')
H-CLAIM-TYP-MOD	12	1	N HEADING ('C' 'T' 'M')
H-PROV-NO	13	7	A HEADING ('PROV' 'NO')
H-PROV-NO2	13	2	A
H-PROV-NO6	13	6	A HEADING ('BILLING' 'PROV')
H-PROV-NO6-7	18	2	A
H-SVC-PROV-NO	20	7	A HEADING ('SVC' 'PROV' 'NO')
H-SVC-PROV-NO3	20	3	A
H-SVC-PROV-NO1	20	1	A
H-SVC-PROV-NO6	21	6	A
H-RECIP-NO	27	6	P 0 HEADING ('RECIP' 'NUMBER')
H-NDC-PROCEDURE	33	11	A HEADING ('NDC/' 'PROC')
H-NDC-1-8	33	8	A
H-NDC-LABELER-CODE	33	5	A
H-NDC	33	11	A HEADING ('NDC' 'CODE')
H-PROCEDURE	33	11	A HEADING 'PROCEDURE'
H-PROC-CODE	33	11	A
H-PROC-3	33	3	A
H-PROC	33	5	A HEADING ('PROC' 'CODE')
H-PROC-6	38	1	A
H-PROC-MOD	33	7	A
H-PROC-MODIFIER	38	2	A HEADING ('PROC' 'MOD')
H-HCPC-MODIFIER	38	2	A HEADING ('PROC' 'MOD')
H-TREAT-PLACE	40	1	A HEADING ('PLACE OF' 'SERVICE')
H-ADMIT-HOUR	41	2	A
H-MOTHA-BABY-IND	43	1	A
H-TOS	44	1	A HEADING ('TYPE' 'OF' 'SERV')
H-UNITS-VISITS-QUANT	45	5	P 3 HEADING ('UNITS')
H-UNITS-NODECIMAL	45	5	P
H-FROM-DATE	50	4	P HEADING ('FROM' 'DATE')
H-THRU-DATE	54	4	P HEADING ('THRU' 'DATE')
H-BILLING-DATE	58	4	P
H-DATE-EMERED	62	4	P
H-STATUS-DATE	66	4	P HEADING (('STATUS' 'DATE')
H-PAYMENT-DATE	70	4	P HEADING ('PAYMENT' 'DATE')
H-BILLED-CHARGES	74	5	P 2 HEADING ('BILLED' 'CHARGES')
H-TOT-DOC-CHARGE	79	5	P 2 HEADING ('TOT' 'DOC' 'CHARGE')
H-LINE-TPL-AMT	84	4	P 2 HEADING ('LINE' 'TPL' 'AMOUNT')
H-TOT-TPL-AMT	88	4	P 2 HEADING ('TPL' 'AMOUNT')
H-CO-PAY-AMT	92	4	P 2 HEADING ('CO-PAY' 'AMOUNT')
H-ALLOWED-AMT	96	5	P 2 HEADING ('ALLOWED' 'AMOUNT')
H-PAYMENT	101	5	P 2 HEADING ('PAID' 'AMT')
H-PA-NUMBER	106	5	P HEADING ('PRIOR' 'AUTH' 'NUMBER')
H-ACCID-IND	111	1	A
H-STICKER-IND	112	1	A
H-ATTACHMENT-IND1	113	2	A
H-ATTACHMENT-IND2	115	2	A
H-ATTACHMENT-IND3	117	2	A
H-ATTACHMENT-IND4	119	2	A
H-ATTACHMENT-IND5	121	2	A
H-EMPLOY-IND	123	1	A

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H-EPSDT-IND	124	1	A	
H-FAM-PLAN-IND	125	1	A	
H-LOCKIN-IND	126	1	A	
H-PRIOR-AUTH-IND	127	1	A	
H-PROV-REV-IND	128	1	A	
H-RECIP-REV-IND	129	1	A	
H-TPL-IND	130	1	A	HEADING ('TPL' 'IND')
H-ATTACH-ICN	131	7	F	
H-MED-REC-NO	138	11	A	HEADING ('MED' 'REC' 'NO')
H-DIAG	149	5	A	HEADING 'DIAG'
H-SEC-DIAG	154	5	A	HEADING ('SEC' 'DIAG')
H-ADJ-REASON	159	2	A	
H-COLLOCATION	161	10	N	
H-CC-COMPONENT	161	2	N	
H-COLLOCATE-CODE	163	8	N	HEADING ('COLLOCATION' 'CODE')
H-FORMER-ICN	171	7	P	HEADING ('FORMER' 'CCN')
H-FORMER-PAYMENT-DATE	178	4	P	HEADING ('PRIOR' 'PAYMENT' 'DATE')
H-FORMER-REMIT-ID	182	4	F	
H-FORMER-CHECK-NUM	186	5	F	HEADING ('FORMER' 'WARRANT #')
H-OPER-CDE	191	3	A	
H-RECIP-CNTL	194	6	P	0 HEADING ('RECIP' 'CNTL')
H-ELIG-PROGRAM-CODE	200	2	A	
H-ELIG-CODE	203	2	N	HEADING ('ELIG' 'CODE')
H-ELIG-SUBTYPE	205	2	A	HEADING ('SUB' 'TYPE')
H-ELIG-CASH-GRANT	207	1	A	
H-PROV-TYPE	208	2	A	HEADING ('PROV' 'TYPE')
H-PROV-SPEC	210	3	A	HEADING ('PROV' 'SPEC')
H-MAX-TIME	213	4	A	
H-DRG-CODE	217	3	A	
H-MDC-CODE	220	2	A	
H-REMIT-ID	222	4	P	
H-CHECK-NUM	226	5	P	HEADING ('CHECK' 'WARRANT #')
H-COS	231	2	A	+
				HEADING ('CATEGORY' 'OF' 'SERVICE')
H-STATUS	233	1	N	HEADING ('S' 'T' 'A')
H-LINE-NOS	234	2	N	
H-SIG-IND	236	1	A	
H-UBB2-BILL-TYPE	237	3	A	HEADING ('TYPE' 'OF' 'BILL')
H-BT-FACILITY	237	1	A	
H-BT-BILL-CLASS	238	1	A	
H-BT-FREQUENCY	239	1	A	
*				
H-ERRORS	240	3	A	OCCURS 10 INDEX ERRIDX
H-EACH-ERROR	H-ERRORS	2	F	
H-EACH-ERROR-FLAG	H-ERRORS	42	1	A
*				
H-EACH-ERROR1	240	2	F	HEADING ('ERR' 'CDE' '#1')
H-EACH-ERROR-FLAG1	242	1	A	HEADING ('ERR' 'FLG' '#1')
H-EACH-ERROR2	243	2	F	HEADING ('ERR' 'CDE' '#2')
H-EACH-ERROR-FLAG2	245	1	A	HEADING ('ERR' 'FLG' '#2')
H-EACH-ERROR3	246	2	F	HEADING ('ERR' 'CDE' '#3')
H-EACH-ERROR-FLAG3	248	1	A	HEADING ('ERR' 'FLG' '#3')
H-EACH-ERROR4	249	2	F	HEADING ('ERR' 'CDE' '#4')
H-EACH-ERROR-FLAG4	251	1	A	HEADING ('ERR' 'FLG' '#4')
H-EACH-ERROR5	252	2	F	HEADING ('ERR' 'CDE' '#5')
H-EACH-ERROR-FLAG5	254	1	A	HEADING ('ERR' 'FLG' '#5')
H-EACH-ERROR6	255	2	F	

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H-EACH-ERROR-FLAG6	257	1	A	
H-EACH-ERROR7	258	2	P	
H-EACH-ERROR-FLAG7	260	1	P	
H-EACH-ERROR8	261	2	F	
H-EACH-ERROR-FLAGE	263	1	A	
H-EACH-ERROR9	264	2	P	
H-EACH-ERROR-FLAG9	266	1	A	
H-EACH-ERROR10	267	2	P	
H-EACH-ERROR-FLAG10	269	1	A	
*				
H-HIST-ERR	270	3	A	OCCURS 10 INDEX HSTIOX
H-EACH-HIST-ERR	H-HIST-ERR	2	P	
H-EACH-HIST-ERR-FLAG	K-HIST-ERR	+2	1	A
*				
H-EACH-HIST-ERR1	270	2	P	HEADING ('HIST' 'ERR1')
H-EACH-HIST-ERR-FLAG1	272	1	A	HEADING ('HIST' 'FLG1')
H-EACH-HIST-ERR2	273	2	F	HEADING ('HIST' 'ERR2')
H-EACH-HIST-ERR-FLAG2	275	1	A	HEADING ('HIST' 'FLG2')
H-EACH-HIST-ERR3	276	2	F	HEADING ('HIST' 'ERR3')
H-EACH-HIST-ERR-FLAG3	278	1	A	HEADING ('HIST' 'FLG3')
H-EACH-HIST-ERR4	279	2	F	HEADING ('HIST' 'ERR4')
H-EACH-HIST-ERR-FLAG4	281	1	A	
H-EACH-HIST-ERR5	282	2	P	HEADING ('HIST' 'ERR5')
H-EACH-HIST-ERR-FLAG5	284	1	A	
H-EACH-HIST-ERR6	285	2	P	
H-EACH-HIST-ERR-FLAG6	287	1	A	
H-EACH-HIST-ERR7	288	2	P	
H-EACH-HIST-ERR-FLAG7	290	1	A	
H-EACH-HIST-ERR8	291	2	P	
H-EACH-HIST-ERR-FLAG8	293	1	A	
H-EACH-HIST-ERR9	294	2	P	
H-EACH-HIST-ERR-FLAG9	296	1	A	
H-EACH-HIST-ERR10	297	2	P	
H-EACH-HIST-ERR-FLAG10	299	1	A	
H-EACH-OVER-EOB1	300	2	P	HEADING ('EOB' 'CDE' '#1')
H-EACH-OVER-EOB-FLAG1	302	1	A	HEADING ('EOB' 'FLG' '#1')
H-EACH-OVER-EOB2	303	2	P	HEADING ('EOB' 'CDE' '#2')
H-EACH-OVER-EOB-FLAG2	305	1	A	HEADING ('EOB' 'FLG' '#2')
H-EACH-OVER-EOB3	306	2	P	HEADING ('EOB' 'CDE' '#3')
H-EACH-OVER-EOB-FLAG3	308	1	A	HEADING ('EOB' 'FLG' '#3')
H-EACH-OVER-EOB4	309	2	P	HEADING ('EOB' 'CDE' '#4')
H-EACH-OVER-EOB-FLAG4	311	1	A	HEADING ('EOB' 'FLG' '#4')
H-EACH-OVER-EOB5	312	2	P	HEADING ('EOB' 'CDE' '#5')
H-EACH-OVER-EOB-FLAG5	314	1	A	HEADING ('EOB' 'FLG' '#5')
H-EACH-OVER-EOB6	315	2	F	
H-EACH-OVER-EOB-FLAG6	317	1	A	
H-EACH-OVER-EOB7	318	2	F	
H-EACH-OVER-EOB-FLAG7	320	1	A	
H-EACH-OVER-EOB8	321	2	P	
H-EACH-OVER-EOB-FLAG8	323	1	A	
H-EACH-OVER-EOB9	324	2	P	
H-EACH-OVER-EOB-FLAG9	326	1	A	
H-EACH-OVER-EOB10	327	2	P	
H-EACH-OVER-EOB-FLAG10	329	1	A	
H-CUTBACK-DAYS-UNITS	330	5	P	3
H-CUTBACK-AMT	335	4	P	2
H-RRSUBMITTAL-NUM1	339	7	P	HEADING ('RTD #')

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H-RSUBMITTAL-NUM2	346	7	P						
H-RSUBMITTAL-NUM3	353	7	P						
H-TPL-STATUS	360	1	A						
H-PRICING-LEVEL	361	1	A						
H-PRICING-FACT	362	2	P						
H-LOCKIN-PROVIDER	364	7	A						
H-OLDEST-DOC-DATE	371	4	P						
H-LATEST-DOC-DATE	375	4	P						
H-EMG-LTC-IND	379	1	A	HEADING ('EMERG' 'IND')					
H-SFEC-PROG-IND	380	2	A						
H-NPI	382	10	A						
H-SURG-IND	392	1	A						
H-PPP-TYPE	393	1	A						
*									
H-TT-OEDUCTIBLE	414	5	P	2					
H-TT-COINSURANCE	419	5	P	2					
H-TT-MEDICARE-BILLED	424	5	P	2					
H-TT-MEDICAID-BILLED	429	5	P	2					
H-TT-MEDICARE-PAID-AMT	434	5	P	2					
H-TT-MCARE-PAY-DATE	439	4	P						
H-TT-BLOOD-DED	443	4	P	HEADING ('BLOOD' 'DEDUCTIBLE')					
H-TT-ASSIGNMENT-IND	447	1	A						
H-TT-INST-TYPE	448	1	A						
H-TT-ATTEND-PHYS	449	7	A						
H-TT-ADMIT-PHYS	456	7	A						
H-TT-PAT-STATUS	463	2	A						
H-TT-DSCHG-DATE	465	4	P						
H-TT-TIME-OF-DEATH	469	2	N						
H-TT-ADMIT-DATE	474	4	P						
H-TT-ADMIT-SOURCE	478	1	A						
H-TT-ADMIT-HOUR	479	2	A						
H-TT-NATURE-ADMSN	481	1	A	HEADING ('NATURE' 'OF' 'ADMIT')					
H-TT-COV-DAYS	482	2	P						
H-TT-NON-COV-DAYS	484	2	P						
*									
H-TT-OCCURRENCE-DATA	486	6	A	OCCURS 5 INDEX TTDIDX					
H-TT-OCC-CODE				2 A					
H-TT-OCC-DATE				H-TT-OCCURRENCE-DATA +2 4 P					
*									
H-TT-OCC-SPAN-CODE	516	2	A						
H-TT-OCC-SPAN-FROM	518	4	P						
H-TT-OCC-SPAN-THRU	522	4	P						
H-TT-COND-CODE1	526	2	A						
H-TT-COND-CODE2	528	2	A						
H-TT-COND-CODE3	530	2	A						
H-TT-COND-CODE4	532	2	A						
H-TT-COND-CODE5	534	2	A						
*									
H-TT-VALUE-CODES	536	6	A	OCCURS 8 INDEX VCDIDX					
H-TT-VAL-CODE				2 A					
H-TT-VAL-AMT				H-TT-VALUE-CODES +2 4 P 2					
*									
H-TT-BLOOD-FURNISHED	584	2	A						
H-TT-BLOOD-REPLACED	586	2	A						
H-TT-BLOOD-NOT-REPL	588	2	A						
*									
H-TT-REVENUE-CODE-DATA	590	24	A	OCCURS 46 INDEX INDXB					

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H-TT-PROC-CODE					5	A
H-TT-REV-CODE	H-TT-REVENUE-CODE-DATA				3	A
H-TT-FILLER	H-TT-REVENUE-CODE-DATA			+3	2	A
H-TT-PROC-MODIFIER	H-TT-REVENUE-CODE-DATA			+5	2	A
H-TT-REV-UNITS	H-TT-REVENUE-CODE-DATA			+7	2	P
H-TT-REV-AMT	H-TT-REVENUE-CODE-DATA			+9	5	P 2
H-TT-REV-NON-COVD-AMT	H-TT-REVENUE-CODE-DATA			+14	5	P 2
H-TT-PROC-ALMD-AMT	H-TT-REVENUE-CODE-DATA			+19	5	P 2
*						
H-TT-SURG-PROC1	1694	5	A	HEADING ('SURG' 'PROC')		
H-TT-SURG-DATE1	1699	4	P			
H-TT-SURG-PROC2	1703	5	A			
H-TT-SURG-DATE2	1708	4	P			
H-TT-LTC-PATIENT-LIABILITY	1712	4	P			
H-TT-SPEC-PROG-IND	1716	1	A			
*						
H-HO-ATTEN-PHYS	414	7	A	HEADING ('ATTENDING' 'PHYSICIAN')		
H-HO-ADMIT-PHYS	421	7	A			
H-HO-PAT-STAT	426	2	A	HEADING ('PAT' 'STAT')		
H-HO-DRCHG-DATE	430	4	P	HEADING ('DISCHARGE' 'DATE')		
H-HO-TIME-OF-DEATH	434	2	N			
H-HO-ADMIT-DATE	437	4	P	HEADING ('ADMIT' 'DATE')		
H-HO-ADMIT-SOURCE	441	1	A	HEADING ('REFERRAL' 'SOURCE')		
H-HO-ADMIT-NATURE	442	1	A	HEADING ('NATURE' 'OF ADMIT')		
H-HO-COV-DAYS-9	443	2	P 0	HEADING ('COV' 'DAYS')		
H-HO-NON-COV-DAYS	445	2	P 0	HEADING ('NON' 'COV' 'DAYS')		
*						
H-HO-OCCURRENCE-DATA	447	6	A	OCCURS 5 INDEX HOCIDX		
H-HO-OCC-CODE	H-HO-OCCURRENCE-DATA			2	A	
H-HO-OCC-DATE	H-HO-OCCURRENCE-DATA			+2	4	P
*						
H-HO-OCC-SPAN-CODE	447	2	A			
H-HO-OCC-SPAN-FROM	479	4	P			
H-HO-OCC-SPAN-THRU	483	4	P			
H-HO-COND-CODE1	487	2	A			
H-HO-COND-CODE2	489	2	A			
H-HO-COND-CODE3	491	2	A			
H-HO-COND-CODE4	493	2	A			
H-HO-COND-CODE5	495	2	A			
*						
H-HO-VALUE-CODES	497	6	A	OCCURS 8 INDEX HOVIDX		
H-HO-VAL-CODE	H-HO-VALUE-CODES			2	A	
H-HO-VAL-AMT	H-HO-VALUE-CODES			+2	4	P
*						
H-HO-BLOOD-FURN	545	2	A			
H-HO-BLOOD-REPL	547	2	A			
H-HO-BLOOD-NOT-REPL	549	2	A			
*						
H-HO-REV-DATA	551	23	A	OCCURS 46 INDEX INDXA		
H-HO-PROC-CODE	H-HO-REV-DATA			5	A	+
	HEADING ('PROC' 'CODE')					
H-HO-REV-CODE	H-HO-REV-DATA			3	A	+
	HEADING ('REV' 'CODE')					
H-HO-REV-CODE2	H-HO-REV-DATA			2	A	
H-HO-FILLER	H-HO-REV-DATA			+3	2	N
H-HO-REV-UNITS-9	H-HO-REV-DATA			+5	2	P +
	HEADING ('REV' 'UNITS')					

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H-HO-REV-AMT	H-HO-REV-DATA	+7	5	P	2	+	
	HEADING ('REV'	'AMOUNT')					
H-HO-REV-NON-COVD-AMT	H-HO-REV-DATA	112	5	P	2	+	
	HEADING ('REV'	'NON COVD'					'AMOUNT')
H-HO-PROC-ALMD-AMT	H-HO-REV-DATA	+17	5	P	2		
H-HO-FILLER2	H-HO-REV-DATA	+22	1	A			
*							
H-HO-SURG-PROCI	1609	5	A	HEADING ('SURG'	'PROC'	'CODE')	
H-HO-SURG-DATE1	1614	4	P				
H-HO-SURG-PROCE	1618	5	A	HEADING ('SURG'	'PROC'	'CODE2')	
H-HO-SURG-DATE2	1623	4	P				
H-HO-LTC-PATIENT-LIABILITY	1627	4	P	2			
H-HO-LTC-LOC	1631	2	A				
H-HO-FER-DIEM	1633	4	P	2			
H-HO-LTC-HOME-LEAVE-DAYS	1637	2	N				
H-HO-LTC-PAR-DATE	1639	4	P				
*							
H-TT-FR-DEDUCTIBLE	414	5	P	2	HEADING ('DEDUCTIBLE')		
H-TT-FR-COINSURANCE	419	5	P	2	HEADING ('COINSURANCE')		
H-TT-FR-MEDICARE-BILLED	424	5	P	2			
H-TT-FR-MEDICAID-BILLED	429	5	P	2	HEADING ('MEDICAID'	'BILLED'	+
					'AMOUNT')		
H-TT-FR-MEDICARE-PAID-AMT	434	5	P	2			
H-TT-FR-MCARE-PAY-DATE	439	4	P				
H-TT-FR-BLOOD-DED	443	4	P				
H-TT-FR-REFER-PROV	447	7	A				
H-TT-FR-TREAT-PLACE	454	1	A				
H-TT-FR-LAB-IND	455	1	A				
H-TT-FR-ASSIGNMENT-IND	456	1	A				
H-TT-FR-INST-TYPE	457	1	A				
H-TT-FR-MCARE-ALLOWED-AMT	458	8	N	2			
*							
H-FR-REFER-PROV	414	7	A	HEADING ('REFER'	'PROV')		
H-FR-LAB-IND	421	1	A				
H-FR-DMB-CERT-DATE	422	4	P				
*							
H-TR-REFER-PROV	414	7	A				
H-TR-EMER-IND	421	1	A				
H-TR-DIAG-IND	422	1	A				
H-TR-CONTROL-NO	423	6	A				
*							
H-DA-TOOTH	414	2	A	HEADING ('T'	'O'	'O'	'T'
H-DA-SURF-1	416	1	A	HEADING ('S'	'U'	'R'	'F'
H-DA-SURF-2	417	1	A	HEADING ('S'	'U'	'R'	'F'
H-DA-SURF-3	418	1	A	HEADING ('S'	'U'	'R'	'F'
H-DA-SURF-4	419	1	A	HEADING ('S'	'U'	'R'	'F'
H-DA-SURF-5	420	1	A	HEADING ('S'	'U'	'R'	'F'
H-DA-EMERGENCY-IND	421	1	A				
*							
H-PH-PRESC-PHYS	414	7	A	HEADING ('PRESCR'	'PHYS')		
H-PH-RX-NO	421	10	A	HEADING ('RX'	'#')		
H-PH-REFILL-CODE	431	1	A	HEADING ('REFILL'	'CODE')		
H-PH-DRUG-PRICE	432	5	P	2	HEADING ('DRUG'	'PRICE')	
H-PH-DAYS-SUPPLY	437	2	P	HEADING ('DAY'	'SUP')		
H-PH-COMPOUND-CODE	439	1	A				
*							
H-EPSDT-SVC-CODE	414	1	A				

EXHIBIT F
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001446



LICH AND PATRICK
WATROOP & BRICKMAN LLC

MEND

September 4, 2007

HAZARDOUS WASTE MAIL ANNUAL

Attn: Environmental Manager
From: Hazardous Waste
2007 Year End Report
Environmental Audit Summary
Columbus, PA 17102-7700

To: **State of Alaska to ER LLC and Company**
Case No: **3457-08-0610CTV**

Environmental
Hazardous Waste
Management
Regulatory
Compliance
Department
State of Alaska
Department of
Environmental
Protection
1225 North
Seward Street
Juneau, Alaska
99801
Phone: 907-586-2000
Fax: 907-586-2000
www.dep.state.ak.us

Dear Sir:

Let us remind of your letter dated August 20th. We will be happy to engage in a letter writing campaign with you since you state an ongoing and unfounded investigation is in progress. The letter campaign will be formal discovery and information. However, I must clarify a few things below:

First, we agreed to join the August 20th conference call with you to discuss, among other things, your concerns regarding the date the State contacted us in June. During that call, the State agreed to provide you informal requests for further data and information relevant to this case. Since that time, the State has provided you with supplemental data responsive to your informal requests, and continues to endeavor to do so despite your repeated and insulting letters to the contrary. The majority of the fees that result of what you are now asking for was not covered in your formal discovery requests, which generally seek information from 1996 to the present, with the exception of certain records which you seek from the time of any Medicaid recipient to the present.

Second, the State has not requested in the Court since you that you have for their records, since that time. It is your obligation and not our obligation to state that we are continuing to provide you further data as requested. The State has requested in you and the Court that it has provided you with the Medicaid claims database that its experts are working with. It said it wishes to the State, we state clearly, are mischaracterizing the Court may have to do. To that extent you have mischaracterized previous correspondence with our representatives of the State to mean that the State would provide you all Medicaid data potentially at its disposal, that mischaracterization is your own making. To the contrary, the State has clearly and consistently maintained that it might have some difficulty producing the data you requested. See Transcript of August 2, 2007 conference call. The State has in fact provided you with everything that has been pulled from the database to date, most of our information identifying individuals. As indicated in previous correspondence, if the data requested by your pending requests will be produced in its entirety, but with the understanding that the State will review such data and remove any and all production of the same. In particular, a list of all eligible fees before you is not production to you here would. Beyond that, the State will do no more than it can.

EXHIBIT F
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