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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
 DISTRICT OF OREGON

EAST PORTLAND IMAGING CENTER,
 P.C., an Oregon professional
 corporation doing business as
 EPIC IMAGING-EAST; and BODY
 IMAGING, P.C., an Oregon
 professional corporation doing
 business as BODY IMAGING
 RADIOLOGY,
 Plaintiffs,

v.

PROVIDENCE HEALTH SYSTEM-OREGON,
 an Oregon nonprofit corporation;
 PROVIDENCE HEALTH PLAN, an Oregon
 nonprofit corporation; PORTLAND
 MEDICAL IMAGING, LLC, an Oregon
 limited liability company;
 RADIOLOGY SPECIALISTS OF THE
 NORTHWEST, P.C., a professional
 corporation; CENTER FOR MEDICAL
 IMAGING, LLC, an Oregon limited
 liability company; and ADVANCED
 MEDICAL IMAGING, LLC, an Oregon
 limited liability company,
 Defendants.

Civil No.

DECLARATION OF DANIEL J.
 URBACH, M.D.

By Plaintiffs

1. I, Daniel J. Urbach, M.D. declare and state as follows:

2. I graduated magna cum laude from Middlebury College (Middlebury, Vermont) with a B.A. in 1982. Following a short post-baccalaureate pre-medical program at Bryn Mawr College (Bryn Mawr, Pennsylvania), I attended medical school and Emory University (Atlanta, Georgia), graduating in 1989. I performed my residency program at St. Vincent Hospital and Medical Center between 1989 and 1992.

3. My experience working in Portland includes employment as a staff physician during 1994 and 1995 with the Sisters of Providence Medical Group. I have maintained a private practice based in Portland since 1996.

4. I am extremely troubled with the decision made by the managers of the Providence Health Systems to remove EPIC Imaging from the group of authorized radiology service providers which Providence-controlled health plans will cover.

5. My concern with the Providence decision directly flows from what I believe will be a decline in the quality of health care service that will result from the Providence decision. During my years of practicing internal medicine in have Portland, I observed that EPIC Imaging has provided significantly better service than any Providence radiology facility. Three areas in which EPIC Imaging consistently betters Providence radiology facilities are (1) availability, (2) efficiency, and (3) communication.

6. Availability: If one of my patients needs imaging work done immediately, EPIC Imaging nearly always is able to accommodate my patient within 24 to 48 hours. The same is not often true for Providence radiology facilities. For patients who do not need immediate service, EPIC Imaging is much more flexible than Providence facilities in working with my patients' schedules to make sure needed radiology work is completed in a timely manner. EPIC Imaging not only bests all Providence radiology facilities for availability, but in my opinion is the most available radiology facility in Portland.

7. Efficiency: Not only have my patients received radiology treatment by both Providence and Epic Imaging, but I too have been a radiology patient at both Providence and EPIC facilities. The ability of EPIC Imaging to complete procedures in a way that yields the images physicians need while minimizing the time the patient must spend at EPIC's clinic is impressive. Support staff are discrete, and the fact that wait time is relatively short at EPIC Imaging works to enhance patient privacy. My experience at Providence Portland, on the other hand, involved longer waits, longer lines, and less respect for patient privacy than I have experienced at EPIC Imaging.

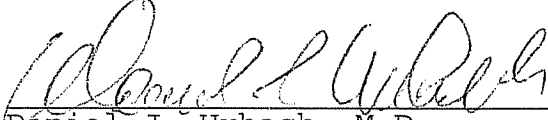
8. Communication: As a general rule, the communication I receive from EPIC Imaging after a radiology image has been made of my patients is more timely than the communication I receive from Providence following completion of a radiology image. Epic Imaging usually sends the reports by facsimile immediately after they are completed. Once an image

has been taken, the radiologist responsible for the image typically interprets the image and prepares a written report memorializing the radiologist's findings. As a rule, written radiology reports prepared by EPIC Imaging are provided more quickly after a referral than written radiology reports for a similar referral made to Providence. Providence's track record concerning timeliness of reports is more of a grab bag. Sometimes reports are faxed immediately, but other times they are sent only by mail and can arrive up to a week after they have been prepared. This is often true even when I have requested the report be sent by facsimile immediately. Often, EPIC Imaging radiologists will make the effort to personally discuss the findings of a radiology procedure with me on the day of the procedure if I am the treating and referring physician. This effort is rarely seen by Providence radiologists even when such calls have been requested by my office when ordering the requested radiology procedure.

9. Based upon my past experience with radiology services provided by EPIC Imaging and Providence, both as a physician and patient, I am of the opinion that Providence's decision to exclude EPIC Imaging (and other radiology providers) from the list of authorized radiology providers available to Providence-controlled health plans, will result in a decrease of quality of service for those EPIC Imaging patients who will now be funneled to Providence for all radiology services. The decision deprives these soon-to-be former EPIC Imaging patients of what has been a significant health care benefit.

10. I declare that the foregoing is true and correct.

DATED this 3rd day of April, 2005.



Daniel J. Urbach, M.D.