



1. I, Paul A. Meunier, declare and state as follows:

2. I have served as Medical Director of Body Imaging Radiology since 1991. I received my B.S. at the U.S. Military Academy in 1973. After serving as an infantry officer in the U.S. Army for four years, I entered medical school and received by medical degree from the University of Vermont College of Medicine in 1981.

3. Historically, Body Imaging Radiology has been a provider for all major insurance plans and has been a respected provider for Providence insurance panels and Providence-controlled health plans for over 16 years. Body Imaging Radiology has two locations on the west side of Portland and offers the following services:

- Short bore, high field MRI scanning
- Helical, multi-detector, high speed CT scanning
- 3 dimensional reconstruction work stations
- Therapeutic/Diagnostic pain management injections
- Bone density screening (DEXA)
- Comprehensive Breast Imaging including:
  - Consultation Services
  - Needle Core Biopsy
  - Breast MRI
- Ultrasound
- General x-ray/fluoroscopy services
- Anesthesia services for pediatric MR/CT patients and adults with severe claustrophobia problems. Body Imaging is the only outpatient Radiology Center providing Anesthesia services.

- Electronic transmission of images and reports to any MD office/Hospital ER
- Consultative IT Services

4. I have reviewed the Complaint filed in this case and can verify that it is true and accurate to the best of my knowledge. Based upon a notice dated February 1, 2005, Body Imaging Radiology is terminated as authorized provider to Providence-controlled health plans. The impact on our firm's practice will be very substantial. We have analyzed that portion of our imaging practice that comes from patients covered by the Providence network of its own health plans and rented provider panels. Over the last three years, this has represented approximately 20% of our overall practice.

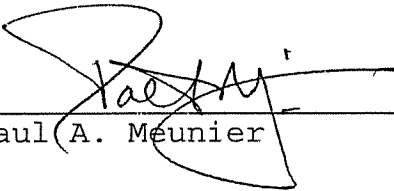
5. Moreover, because of the confusion that will be created in the market and the administrative difficulties for intake and administrative staff at referring physician offices, we estimate that there will be a significant shift in the referrals of patients who would otherwise have insurance coverage for diagnostic imaging at our facility to Providence-controlled facilities instead. I estimate that this will cost our firm an additional 15% to 20% of our overall practice.

6. Based on my observations over the last decade, I strongly believe that the Providence defendants are pursuing a course of action designed to accumulate market power in as many segments of the health care industry as possible in the Portland area market. This is being accomplished by acquiring and/or expanding acute hospital care and outpatient clinic facilities and

a variety of exclusionary practices designed to lock up segments of the market through physician alignment and insurance products. If the Providence defendants are allowed to continue on this path of consolidation in Portland area medical markets, I have grave concern that Body Imaging Radiology could be forced out of business or, at a minimum, downsized to a small fraction of our existing practice.

7. I declare under penalty of perjury that the foregoing is true and correct.

DATED this 4<sup>th</sup> day of April, 2005.

  
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Paul A. Meunier