

## **Redaction & Confidentiality Log – Submission dated December 12, 2025**

Per OAR 409-070-0070 and other applicable law, this document identifies those documents that are exempt from public disclosure, and explains the grounds for such exemption. Under OAR 409-070-0070(3), “[c]onfidential materials filed by an applicant in connection with a [HCMO] transaction that is subject to review by . . . the [Oregon Health] Authority . . . must be maintained as confidential materials in accordance with . . . ORS 415.501(13)(c).” Under ORS 415.501(13)(c), the Oregon Health Authority “shall maintain the confidentiality of all confidential information and documents that are not publicly available that are obtained in relation to a [HCMO] material change transaction.” Such information is “exempt from disclosure under ORS 192.311 to 192.478 [the Public Records Act].” The documents and information identified below are confidential and contain information that is not publicly available. Therefore, the applicant respectfully ask that the Oregon Health Authority maintain the confidentiality of such documents and not release any such documents under the Oregon Public Records Act.

This document in no way limits either party’s right to assert additional or alternative grounds for exemption from the Oregon Public Records Act. The applicant respectfully requests highly confidential treatment under all applicable statutes, rules, and regulations. Without prejudice to the rights of Asante and its subsidiaries (“Asante”), or Southern Oregon Surgery Center, LLC (“SCSO”), if the Oregon Health Authority or Department of Justice should at any time contemplate disclosing any redacted, or otherwise confidential or privileged, materials to the public or to any third party for any reason and for any use—including but not limited to quoting from, attaching, or otherwise referring to such documents in a court or administrative proceeding whether filed under seal or publicly—we request an opportunity of no fewer than three days’ advance notice to allow sufficient time to object and, if necessary, seek protections against disclosure from a court of competent jurisdiction.

Reference	Party Information	Information Requested	Information Redacted	Basis for Redaction
Response Dated December 12, 2025 to Request for Information (RFI”) Letter, Appendix A, Page 12-13	SCSO	Loan Documents	Responses to RFIs 32, 33, and 34	SCSO requests confidential treatment of this information. This information has not been made publicly available in any other forum. Under ORS § 415.501(13)(c), the Oregon Health Authority is prohibited from disclosing confidential information and documents that are not publicly available that are obtained in relation to a material change transaction. This information is competitively sensitive, and disclosure could be used by others for business advantage. Therefore, this information is protected as a “trade secret” under ORS § 192.345(2) and further protection under ORS § 192.355(9)(a) and ORS § 646.461 et seq. Further, OHA marked as confidential the RFIs pursuant to which this information is provided. As such, SCSO is requesting further confidential treatment of this information unless SCSO provides its written consent to publication.
Response Dated December 12, 2025 to RFI Letter, Appendix B, Page 2	SCSO	Financial Information	Certain financial information	SCSO requests confidential treatment of this information. This information has not been made publicly available in any other forum. Under ORS § 415.501(13)(c), the Oregon Health Authority is prohibited from disclosing confidential information and documents that are not publicly available that are obtained in relation to a material change transaction. This information is competitively sensitive, and disclosure could be used by others for business advantage. Therefore, this information is protected as a “trade secret” under ORS § 192.345(2) and further protection under ORS § 192.355(9)(a) and ORS § 646.461 et seq. As such, SCSO is requesting further confidential treatment of this information unless SCSO provides its written consent to publication.
HCMO: Asante/SCSO Bates No. 267-274	SCSO	Transaction Communications	All information contained in the Transaction Communications	SCSO requests confidential treatment of this document. This information has not been made publicly available in any other forum. Under ORS § 415.501(13)(c), the Oregon Health Authority is prohibited from disclosing confidential information and documents that are not publicly available that are obtained in relation to a material change transaction. This information is competitively sensitive, and disclosure of this information would enable competitors to identify and exploit vulnerabilities in the company's governance model. Therefore, this information is protected as a “trade secret” under ORS § 192.345(2) and further protection under ORS § 192.355(9)(a) and ORS § 646.461 et seq. As such, SCSO is requesting further confidential treatment of this information unless SCSO provides its written consent to publication.
HCMO: Asante/SCSO Bates	Asante/SCSO	Procedure Volume	All information	Asante and SCSO request confidential treatment of this document.

Reference	Party Information	Information Requested	Information Redacted	Basis for Redaction
No. 275-293			contained in the Procedure Volume	This information has not been made publicly available in any other forum. Under ORS § 415.501(13)(c), the Oregon Health Authority is prohibited from disclosing confidential information and documents that are not publicly available that are obtained in relation to a material change transaction. This information is competitively sensitive, and disclosure could be used by others for business advantage. Therefore, this information is protected as a “trade secret” under ORS § 192.345(2) and further protection under ORS § 192.355(9)(a) and ORS § 646.461 et seq. As such, Asante and SCSO are requesting further confidential treatment of this information unless Asante and SCSO provides their written consent to publication.
HCMO: Asante/SCSO Bates No. 294-295	Asante/SCSO	Unanimous Vote to Expel	All information contained in the Unanimous Vote to Expel	Asante and SCSO request confidential treatment of this document. This information has not been made publicly available in any other forum. Under ORS § 415.501(13)(c), the Oregon Health Authority is prohibited from disclosing confidential information and documents that are not publicly available that are obtained in relation to a material change transaction. This information is competitively sensitive, and disclosure of this information would enable competitors to identify and exploit vulnerabilities in the company's governance model. Therefore, this information is protected as a “trade secret” under ORS § 192.345(2) and further protection under ORS § 192.355(9)(a) and ORS § 646.461 et seq. As such, Asante and SCSO are requesting further confidential treatment of this information unless Asante and SCSO provides their written consent to publication.
HCMO: Asante/SCSO Bates No. 296-325	SCSO	Loan Documents	All information contained in the Loan Documents	SCSO requests confidential treatment of this document. This information has not been made publicly available in any other forum. Under ORS § 415.501(13)(c), the Oregon Health Authority is prohibited from disclosing confidential information and documents that are not publicly available that are obtained in relation to a material change transaction. This information is competitively sensitive, and disclosure could be used by others for business advantage. Therefore, this information is protected as a “trade secret” under ORS § 192.345(2) and further protection under ORS § 192.355(9)(a) and ORS § 646.461 et seq. As such, SCSO is requesting further confidential treatment of this information unless SCSO provides its written consent to publication.