

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
KANSAS CITY, MISSOURI**

Medical Supply CHAIN, INC.,	)
<i>Plaintiff,</i>	)
v.	) Case No. 05-0210-CV-W-ODS
NOVATION, LLC	) Attorney Lien
NEOFORMA, INC.	)
ROBERT J. ZOLLARS	)
VOLUNTEER HOSPITAL ASSOCIATION	)
CURT NONOMAQUE	)
UNIVERSITY HEALTHSYSTEM CONSORTIUM	)
ROBERT J. BAKER	)
US BANCORP, NA	)
US BANK	)
JERRY A. GRUNDHOFFER	)
ANDREW CESERE	)
THE PIPER JAFFRAY COMPANIES	)
ANDREW S. DUFF	)
SHUGHART THOMSON & KILROY	)
WATKINS BOULWARE, P.C.	)
<i>Defendants.</i>	)

**COMPLAINT**

Comes now the plaintiff Medical Supply Chain, Inc., through its counsel, Bret D. Landrith and makes the following complaint for federal antitrust and state contract related claims.

**Outline of Petition**

Jurisdiction

1. Subject Matter Jurisdiction
2. Personal Jurisdiction
3. Venue
4. Governing Law

Facts

1. Parties
  - a. Plaintiff
  - b. Defendants
  - c. Coconspirators Not Named As Defendants In This Action
2. The Relative Markets
  - a. The Nationwide Hospital Supply Market
  - b. The Nationwide e-commerce Hospital Supply Market
  - c. The Upstream Healthcare technology Company Capitalization Nationwide Market
3. Anticompetitive Activity in the Subject Relevant Markets
  - a. The Harm To Buyers In The Market
    - i. The Harm to Hospitals
    - ii. The Harm To Healthcare Services Consumers
    - iii. Loss of Healthcare Insurance
    - iv. The Injury To Healthcare Insurance Plans
    - v. The Loss Of Life From Decreased Access To Healthcare
  - b. The Harm to Medical Supply
  - c. The Need For Private Antitrust Enforcement
    - i. The Limited Resources Of The US Department Of Justice