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June 19, 2007

Citigroup Global Markets Inc., as Representative of the
Underwriters named in the Purchase Contract (defined
herein) with the Allegheny County Hospital Development
Authority
390 Greenwich Street
New York, New York 10013

Ladies and Gentlemen:

We have acted as your counsel in connection with your purchase from the Allegheny County Hospital Development Authority (the "Issuer") of $752,370,000 aggregate principal amount of the Issuer's Health System Revenue Bonds (West Penn Allegheny Health System), Series 2007A (the "Bonds") pursuant to the Purchase Contract dated May 17, 2007 (the "Purchase Contract") between you and the Issuer. This opinion is delivered to you pursuant to paragraph 3(e)(7) of the Purchase Contract. Terms which are defined in the Purchase Contract are used herein as therein defined.

We have participated in the preparation of the Issuer's Preliminary Official Statement dated April 24, 2007, as supplemented, and the final Official Statement dated May 17, 2007, concerning the Bonds (together, the "Official Statement"). During the course of the preparation of the Official Statement, we have participated in conferences with representatives of the Issuer, including bond counsel to the Issuer, Orrick, Herrington & Sutcliffe, LLP; representatives of West Penn Allegheny Health System, Inc. (the "Corporation"), including its counsel Cohen & Grigsby, P.C.; the Corporation's auditors, Deloitte & Touche, LLP and your representatives. At those conferences, the contents of the Official Statement and related matters were discussed and reviewed. We have examined originals or copies (certified or otherwise), identified to our satisfaction, of the agreements, letters, certificates and opinions of even date herewith provided to you pursuant to the Purchase Contract and have examined certain files, books, records and instruments of the Corporation and the Obligated Group.

We have not independently verified the accuracy, completeness or fairness of the statements made or the information contained in the Official Statement, and we are not passing upon and do not assume any responsibility therefor; nor are we expressing any opinion or views

on the authorization, issuance, delivery or validity of the Bonds. However, we do advise you that, in the course of our participation described above, no facts came to our attention that would lead us to believe that the Official Statement (except for any financial statements of the Corporation, any other financial, technical or statistical data and the information regarding DTC and its book-entry system, as to which no view is expressed), as of the date thereof or the date hereof, contained or contains any untrue statement of a material fact or omitted or omits to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading.

We are of the opinion that the Bonds are exempt from registration under the Securities Act of 1933, as amended (the "1933 Act"), and it is not necessary, in connection with the offering and sale of the Bonds, to register the Bonds under the 1933 Act or to qualify the Bond Indenture for the Bonds, dated as of May 1, 2007 between the Issuer and The Bank of New York Trust Company, N.A., as Bond Trustee, under the Trust Indenture Act of 1939.

We are also of the opinion that the Continuing Disclosure Agreement, satisfies the requirements contained in Rule 15c2-12 promulgated by the Securities and Exchange Commission (the "Rule") for an undertaking for the benefit of the holders of the Bonds to provide the information at the times and in the manner required by said Rule.

We are furnishing this letter to you solely for your benefit in connection with the issuance of the Bonds. This opinion may not be relied upon by any subsequent holders of the Bonds.

Very truly yours,

Ropes & Gray LLP

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