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November 15, 2004

*Via e-mail and
U.S. Mail*

C. David Johnstone
Assistant Attorney General
Office of the Attorney General
1024 Capital Center Drive, Suite 200
Frankfort, Kentucky 40601

*Re: Commonwealth of Kentucky, ex rel. Gregory D. Stumbo v. Abbott Laboratories, Inc.
Franklin Circuit Court, Civil Action No. 03-CI-1134*

Dear Dave:

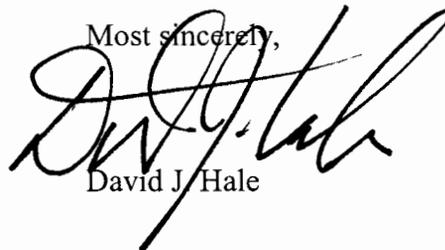
Enclosed are Abbott Laboratories Inc.'s written responses to plaintiff's first set of interrogatories and written responses to plaintiff's request for production of documents. We have forwarded copies of the responses to your outside co-counsel.

We are not comfortable proceeding with the production of documents in the absence of a protective order. While we should be prepared to move forward with production of documents following Judge Graham's ruling, we cannot begin the document production today.

In our written responses, we have made a good-faith effort to respond to your discovery requests as effectively as possible given their breadth and detail. If you have any questions regarding the substance of our responses, please contact me. We will be happy to work through any concerns you may have.

I look forward to discussing this matter with you further.

Most sincerely,



David J. Hale

DJH/kmc
Enclosures

cc: Toni-Ann Citera (w/out enclosures)
Palmer Gene Vance II (w/enclosures)
William T. Robinson III (w/enclosures)