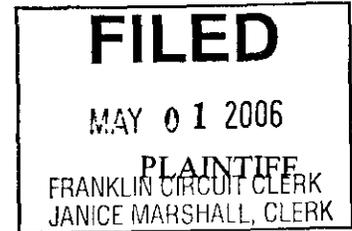


COMMONWEALTH OF KENTUCKY
FRANKLIN CIRCUIT COURT - DIV. II
CIVIL ACTION NO. 03-CI-1134



COMMONWEALTH OF KENTUCKY
ex rel. GREGORY D. STUMBO, ATTORNEY GENERAL

v.

ABBOTT LABORATORIES, INC.

DEFENDANT

**NOTICE OF FILING
OF TARGET DRUG LIST**

The Plaintiff, the Commonwealth of Kentucky ("the Commonwealth"), by its Attorney General, Gregory D. Stumbo, hereby files the Target Drug List attached hereto as Exhibit A, which details the specific drugs manufactured and marketed by the defendant for which the Commonwealth seeks to recover damages. The drugs on this list were selected because the Commonwealth has spent a substantial amount of money purchasing them for its most vulnerable citizens- in excess of \$100,000 for each drug - and because the Commonwealth has evidence that the published AWP's of each of these drugs was inaccurate and inflated. The Commonwealth files this Target Drug List to address arguments advanced by defendant in its motion to dismiss that the Commonwealth failed to identify what drugs are at issue in this case and to streamline discovery in this matter.

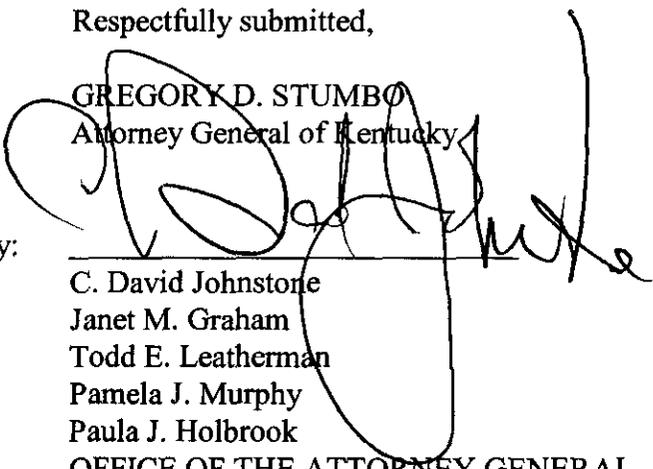
Lest there be no confusion, the Commonwealth is submitting this Target Drug List to place the defendant on notice of the specific drugs that are currently at issue in this litigation and to limit, for now, the amount of sales data that it will be required to provide in discovery responses. The Amended Complaint alleges, and the Commonwealth intends to prove at trial, that the defendant has been continuously engaged in a scheme to mask the true acquisition cost of all its drugs, and will continue to seek discovery of materials evidencing this scheme even if such evidence relates to drugs not on this

list. The Commonwealth therefore reserves the right to add or delete drugs to the attached Target Drug List as discovery progresses.

Respectfully submitted,

GREGORY D. STUMBO
Attorney General of Kentucky

By:



C. David Johnstone
Janet M. Graham
Todd E. Leatherman
Pamela J. Murphy
Paula J. Holbrook
OFFICE OF THE ATTORNEY GENERAL
1024 Capital Center Drive, Suite 200
Frankfort, Kentucky 40601
(502) 696-5300
(502) 573-7150 FAX

Charles Barnhill, Jr.
William P. Dixon
MINER BARNHILL & GALLAND, P.C.
Suite 803
44 East Mifflin St
Madison, Wisconsin 53703
(608) 255-5200
(608) 255-5380 FAX

George F. Galland, Jr.
Robert S. Libman
MINER, BARNHILL & GALLAND, P.C.
14 West Erie Street
Chicago, Illinois 60610
(312) 751-1170
(312) 751-0438 FAX

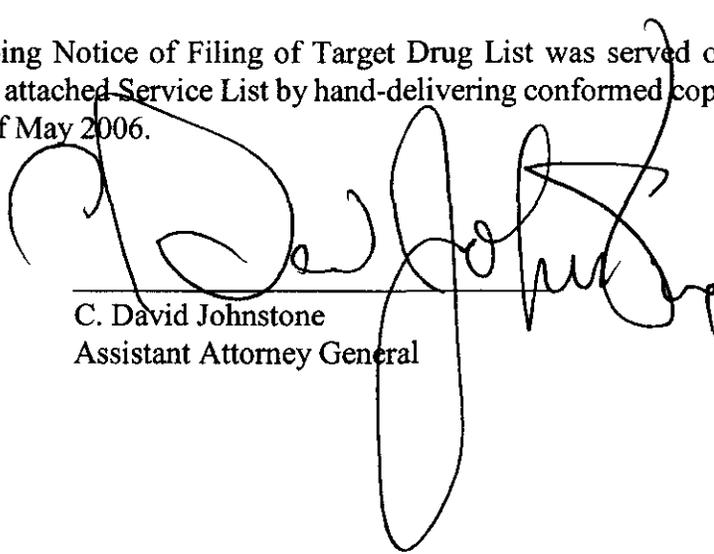
P. Jeffrey Archibald
ARCHIBALD CONSUMER LAW OFFICE
1914 Monroe Street
Madison, WI 53711
(608) 661-8855
(608) 661-0067 FAX

Michael Winget-Hernandez
WINGET-HERNANDEZ, LLC
466 Pine Crest Drive
Troy, Virginia 22974
(512) 474-4095
(512) 697-0080 FAX

Counsel for Plaintiff,
Commonwealth of Kentucky

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Notice of Filing of Target Drug List was served on the individuals whose names appear on the attached Service List by hand-delivering conformed copies of same in open court on this the 1st day of May 2006.



C. David Johnstone
Assistant Attorney General

SERVICE LIST

John S. Reed
David J. Hale
REED WEITKAMP SCHELL & VICE PLLC
500 West Jefferson Street, Suite 2400
Louisville, Kentucky 40202
502-589-1000

Counsel for Abbott Laboratories, Inc.

James R. Daly
Jeremy P. Cole
JONES DAY
77 West Wacker Drive
Chicago, Illinois 60601-1692
312-782-3939

Co-counsel for Abbott Laboratories, Inc.

Toni-Ann Citera
JONES DAY
222 East 41st Street
New York NY 10017
212-326-3939

Co-counsel for Abbott Laboratories, Inc.

R. Christopher Cook
Jesse A. Witten
JONES DAY
51 Louisiana Avenue, N. W.
Washington, D.C. 20001-2113
202-879-3939

Co-counsel for Abbott Laboratories, Inc.

TARGET DRUG LIST

ABBOTT LABORATORIES

ACETIC ACID
ACTIQ
AMINOSYN
BIAXIN
CLORAZEPATE
CYLERT
DEPAKENE
DEPAKOTE
DEXTROSE
DILAUDID
DOBUTAMINE
EES
ERYTHROMYCIN
FUROSEMIDE
GABITRIL
GENGRAF
HEPARIN
HUMIRA
HYTRIN
IBUPROFEN
ISOPTIN
K-TAB
KALETRA
LIPOSYN
LORAZEPAM
MAVIK
METRONIDAZOLE
NORVIR
OMNICEF
PEDIALYTE
PEDIAZOLE
POTASSIUM
PROSOM
PROVIGIL
RYTHMOL
SANTYL
SODIUM CHLORIDE
SSD
SYNTHROID

TARKA
TOBRAMYCIN
TRICOR
VANCOMYCIN
WATER

EXHIBIT A