

**The State of Texas *ex rel.* Ven-A-Care of the Florida Keys, Inc. v. Abbott Laboratories, Inc., et al.**  
**Privilege Log of Abbott Laboratories, Inc.**

	Date(s)	Author(s)	Recipient(s)	Description	Privilege	Page Count
1	2/2/1996	Sharon Jones	J. G. Kringel C. L. Gutman C. B. Begley J. M. Ibanez D. C. Robertson G. R. Wiebking J. S. Aten C. M. Callan W. M. Narajowski R. E. Tweed S. E. Murphy cc: M. E. Barmak fax fwd from Kim Serzynski to Charlie Mitchell fwd: Jerrie Erik	Correspondence regarding collection of documents for civil investigation at direction of legal counsel and in anticipation of litigation	AC, WP	11
2	2/16/1996	Jerrie Cicerale	Charlie Mitchell	Correspondence regarding collection of documents for civil investigation at direction of legal counsel and in anticipation of litigation	AC, WP	12
3	2/16/1996	Jerrie Cicerale	Charlie Mitchell fwd: Tom Turner	Correspondence regarding collection of documents for civil investigation at direction of legal counsel and in anticipation of litigation	AC, WP	9
4	10/27/1997	Jerrie Cicerale	Harry Adams cc: Tom Turner	Correspondence regarding procedure for communications to data companies prepared at the request of legal counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	1
5	5/18/2000	Alan Greenthal	James Van Bolhuis cc: Robyn Allen-McKinnon Jerrie Cicerale Mary Jenn Fisher Robert Lyman	Correspondence regarding legal counsel request for documents for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	1
6	5/18/2000	Alan Greenthal	Mary Jenn Fisher cc: Jerrie Cicerale Alan Greenthal Mike Phillips	Correspondence regarding legal counsel request for documents for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	1

	Date(s)	Author(s)	Recipient(s)	Description	Privilege	Page Count
7	5/18/2000	Alan Greenthal	James Van Bolhuis cc: Robyn Allen-McKinnon Jerrie Cicerale Mary Jenn Fisher Robert Lyman fwd: Mike Phillips	Correspondence regarding legal counsel request for documents for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	2
8	5/18/2000	Mike Sellers	Jerrie Cicerale Alan Greenthal cc: Robert Lyman	Correspondence regarding data requested by legal counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	1
9	5/19/2000	Shirish Patel	Alan Greenthal Jerrie Cicerale	Correspondence regarding data requested by legal counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	2
10	5/19/2000	Shirish Patel	Alan Greenthal Jerrie Cicerale	Correspondence and report regarding data requested by legal counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	114
11	5/19/2000	Shirish Patel	Alan Greenthal Jerrie Cicerale	Correspondence regarding data requested by legal counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	4
12	5/22/2000	Jerrie Cicerale	Shirish Patel cc: Alan Greenthal Diane Latz	Correspondence and report regarding data requested by legal counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	81
13	5/22/2000	Jerrie Cicerale	Mary Jenn Fisher cc: Jerrie Cicerale	Correspondence and report regarding data requested by legal counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	2
14	5/22/2000	Mike Sellers	Richard Gonzalez cc: Pete Baker Guy Wiebking Stacey Chronis Lynn Leone Robert Lyman Susan Rodriguez	Correspondence to legal counsel and others transmitting information in connection with DOJ pricing survey for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	1
15	5/22/2000	Mike Sellers	Richard Gonzalez cc: Pete Baker Guy Wiebking Stacey Chronis Lynn Leone Robert Lyman Susan Rodriguez fwd: Robert Lyman	Correspondence to legal counsel and others transmitting information in connection with DOJ pricing survey for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	1

	Date(s)	Author(s)	Recipient(s)	Description	Privilege	Page Count
16	6/12/2000	Lynn Leone	Mike Sellers	Correspondence providing sales analysis prepared at direction of legal counsel in connection with DOJ pricing survey for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	2
17	6/12/2000	Lynn Leone	Mike Sellers	Correspondence providing sales analysis prepared at direction of legal counsel in connection with DOJ pricing survey for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	2
18	6/16/2000	Lynn Leone	Mike Sellers	Correspondence providing sales analysis prepared at direction of legal counsel in connection with DOJ pricing survey for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	2
19	6/16/2000	Lynn Leone	Mike Sellers fwd: Robert Lyman	Correspondence providing sales analysis prepared at direction of legal counsel in connection with DOJ pricing survey for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	3
20	6/30/2000	Lynn Leone	Mike Sellers	Correspondence providing sales analysis prepared at direction of legal counsel in connection with DOJ pricing survey for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	1
21	6/30/2000	Lynn Leone	Mike Sellers	Correspondence providing sales analysis prepared at direction of legal counsel in connection with DOJ pricing survey for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	5
22	9/29/2000	Ellen Klaus	Jerrie Cicerale cc: Diane Latz fwd: Robert Lyman Alan Greenthal Charlotte Perrin	Correspondence regarding collection of documents for civil investigation at direction of legal counsel and in anticipation of litigation	AC, WP	2
23	10/10/2000	Ann Fahey-Widman	Mike Sellers cc: Catherine Babington Tareta Lewis Christy Beckmann	Correspondence regarding sales information prepared at the request of legal counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	1
24	10/10/2000	Ann Fahey-Widman	Mike Sellers cc: Catherine Babington Tareta Lewis Christy Beckmann	Correspondence regarding sales information prepared at the request of legal counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	2
25	11/15/2000	Diane Latz	Robert Lyman fwd: Stacey Chronis cc: Mike Sellers	Correspondence transmitting pricing information in connection with price adjustment project undertaken at direction of counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	1
26	11/15/2000	Diane Latz	Robert Lyman fwd: Stacey Chronis cc: Mike Sellers	Correspondence transmitting pricing information in connection with price adjustment project undertaken at direction of counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	171

	Date(s)	Author(s)	Recipient(s)	Description	Privilege	Page Count
27	11/15/2000	Joe Brundza	Laurie Hernandez cc: Mike Sellers	Correspondence transmitting pricing information in connection with DOJ pricing survey for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	2
28	11/15/2000	Joe Brundza	Laurie Hernandez cc: Mike Sellers	Correspondence transmitting pricing information in connection with DOJ pricing survey for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	2
29	11/16/2000	Robert Lyman	Mike Sellers Stacey Chronis	Correspondence transmitting sales information in connection with price adjustment project undertaken at direction of counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	1
30	11/16/2000	Robert Lyman	Mike Sellers Stacey Chronis	Correspondence transmitting sales information in connection with price adjustment project undertaken at direction of counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	1010
31	1/9/2001	Meylenne Soto	Mike Sellers	Correspondence and information prepared in connection with price adjustment project undertaken at direction of counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	1
32	1/9/2001	Meylenne Soto	Mike Sellers	Correspondence and information prepared in connection with price adjustment project undertaken at direction of counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	10
33	1/9/2001			Pricing information spreadsheets prepared in connection with price adjustment project undertaken at direction of counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	3
34	1/10/2001			Pricing information spreadsheets prepared in connection with price adjustment project undertaken at direction of counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	2
35	1/17/2001	Lynn Leone	Mike Sellers	Correspondence transmitting information and analysis prepared in connection with price adjustment project undertaken at direction of counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	2
36	1/17/2001	Lynn Leone	Mike Sellers	Correspondence transmitting information and analysis prepared in connection with price adjustment project undertaken at direction of counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	2
37	1/17/2001	Lynn Leone	Mike Sellers	Correspondence transmitting information and analysis prepared in connection with price adjustment project undertaken at direction of counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	1
38	1/17/2001	Lynn Leone	Mike Sellers	Correspondence transmitting information and analysis prepared in connection with price adjustment project undertaken at direction of counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	1
39	1/17/2001	Lynn Leone	Mike Sellers	Correspondence transmitting information and analysis prepared in connection with price adjustment project undertaken at direction of counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	2

	Date(s)	Author(s)	Recipient(s)	Description	Privilege	Page Count
40	1/18/2001	Mike Sellers		Memorandum prepared for legal counsel regarding price adjustment project undertaken at direction of counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	2
41	1/24/2001	Stacey Chronis	<u>cover sheet</u> Loreen Mershimer Mike Sellers Pete Karas Charlie Brock <u>memorandum</u> Pete Baker Pete Karas Loreen Mershimer Mike Sellers cc: Charlie Brock Laura Schumacher	Memorandum and fax cover sheet prepared by legal counsel regarding price adjustment project undertaken at direction of counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	4
42	1/25/2001			Pricing information spreadsheets prepared in connection with price adjustment project undertaken at direction of counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	3
43	2/8/2001		Prepared at request of Legal Department - L. Schumacher	Pricing information spreadsheet prepared in connection with price adjustment project undertaken at direction of counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	1
44	2/22/2001	Mike Sellers		Handwritten note prepared in connection with price adjustment project undertaken at direction of counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	1
45	2/23/2001			Pricing information spreadsheets prepared in connection with price adjustment project undertaken at direction of counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	5
46	3/7/2001	Mike Sellers	"Meeting Attendees"	Analyses prepared in connection with price adjustment project undertaken at direction of counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	11
47	4/11/2001	Harry Adams		Draft cover letter in connection with price adjustment project undertaken at direction of counsel and in anticipation of litigation	AC, WP	1
48	4/11/2001	Mike Sellers	Chris Begley Peter Karas Loreen Mershimer Guy Wiebking	Correspondence transmitting draft cover letter and handwritten edits in connection with price adjustment project undertaken at direction of counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	2

	Date(s)	Author(s)	Recipient(s)	Description	Privilege	Page Count
49	4/11/2001	Mike Sellers	Chris Begley Peter Karas Loreen Mershimer Guy Wiebking	Correspondence transmitting draft cover letter and handwritten edits in connection with price adjustment project undertaken at direction of counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	2
50	4/11/2001 estimated			Memorandum and worksheets in connection with price adjustment project undertaken at direction of counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	24



	Date(s)	Author(s)	Recipient(s)	Description	Privilege	Page Count
54	4/30/2001 estimated	Mike Sellers	Begley Wiebking Mershimer Schumacher Chronis Karas Baker Adams Leone Murray Allen-McKinnon	Memorandum to legal counsel and others seeking legal advice regarding customer inquiries in connection with price adjustment project undertaken at direction of counsel	AC	1
55	5/1/2001	Mike Sellers		Draft of internal memorandum and FAQs prepared in connection with price adjustment project undertaken at direction of counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	3
56	5/3/2001	Mike Sellers	Pete Baker	Correspondence forwarding legal counsel's handwritten edits to internal memorandum and FAQs in connection with price adjustment project undertaken at direction of counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	5
57	5/3/2001	Stacey Chronis	Mike Sellers	Correspondence transmitting legal counsel's handwritten edits to cover letter, internal memorandum, and FAQs in connection with price adjustment project undertaken at direction of counsel for the purpose of rendering legal advice and in anticipation of litigation; internal memorandum and FAQs are listed above	AC, WP	2
58	5/18/2001	Jeff Balzar	Mike Sellers Pete Baker Pete Karas Fax Fwd: Laura Schumacher	Correspondence to legal counsel enclosing internal memorandum for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	2
59	5/30/2001	Laura Schumacher	Mike Sellers Pete Baker cc: Amy St. Eve	Correspondence from legal counsel providing legal advice and draft response in connection with customer inquiry in connection with price adjustment project undertaken at direction of counsel and in anticipation of litigation	AC, WP	2
60	5/30/2001	Laura Schumacher	Mike Sellers Pete Baker cc: Amy St. Eve	Correspondence from legal counsel providing legal advice and draft response in connection with customer inquiry in connection with price adjustment project undertaken at direction of counsel and in anticipation of litigation	AC, WP	2
61	6/7/2001	Mike Sellers	Laura Schumacher cc: Amy St. Eve	Correspondence transmitting non-privileged competitor memorandum in connection with price adjustment project undertaken at direction of legal counsel for purpose of rendering legal advice	AC	2

	Date(s)	Author(s)	Recipient(s)	Description	Privilege	Page Count
62	6/14/2001			Draft memorandum prepared in connection with price adjustment project undertaken at direction of counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	2
63	6/18/2001 estimated		Requested by Laura Schumacher cc: Cathy Babington	Memorandum regarding pricing requested by legal counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	3
64	6/18/2001 estimated		Requested by Laura Schumacher cc: Cathy Babington	Memorandum regarding price adjustment project undertaken at direction of counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	1
65	6/18/2001 estimated		Requested by Laura Schumacher cc: Cathy Babington	Memorandum regarding price adjustment project undertaken at direction of counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	1
66	6/18/2001		Requested by Laura Schumacher cc: Cathy Babington	Memorandum regarding price adjustment project undertaken at direction of counsel for the purpose of rendering legal advice and in anticipation of litigation	AC, WP	1
67	6/18/2001 estimated		Laura Schumacher cc: Cathy Babington	Memorandum regarding price adjustment project undertaken at direction of counsel and in anticipation of litigation	AC, WP	1

	Date(s)	Author(s)	Recipient(s)	Description	Privilege	Page Count
68	12/13/2001	Ellen Klaus	bucknbr shepawc grangjc zaragod dja gielodp bellge garrijk martijx1 giammkl laneke kellybradshaw ansarlx carmila hanadlk barsama buckmx homir pam krisspl lippira rsowen99 faze minicse trainsm allintb cc: HAMLJL	Correspondence regarding collection of documents for civil investigation at direction of legal counsel and in anticipation of litigation	AC, WP	2