

and grounds are expressly reserved and may be interposed at the time of trial or other hearing or proceeding.

3. AstraZeneca's responses and objections shall not be deemed to constitute an admission:

- a. that any particular document or thing exists, is relevant, non-privileged, or admissible in evidence; or
- b. that any statement or characterization in the Interrogatories and Requests is accurate or complete.

4. AstraZeneca's responses are based upon reasonable review and diligent investigation to date.

5. AstraZeneca reserves the right at any time to revise, supplement, correct, clarify, or add to these responses and objections, or to revise, supplement, correct, clarify, or add to any production of information made pursuant to the Interrogatories and Requests. AstraZeneca further reserves the right to object on any ground at any time to a demand for further answers to the Interrogatories and Requests.

6. AstraZeneca's responses and objections are submitted without prejudice to AstraZeneca's right to produce evidence of any subsequently discovered fact. AstraZeneca accordingly reserves its right to provide further responses and objections as additional facts are ascertained.

7. To the extent that AstraZeneca's responses to the Interrogatories and Requests concern information or documents subject to the Protective Order in this action, they must be treated accordingly.

GENERAL OBJECTIONS

AstraZeneca makes the following General Objections, which apply to each and every Interrogatory and Request, and are incorporated by reference in each and every response below as if set forth fully therein. Failure to reiterate a General Objection below does not constitute a waiver of that or any other objection.

1. AstraZeneca objects to the Interrogatories and Requests to the extent that they seek information, documents, or admissions that are neither relevant to the subject matter of the pending action nor reasonably calculated to lead to the discovery of admissible evidence.

AstraZeneca further objects to the Interrogatories and Requests to the extent that they seek information not limited to AstraZeneca's practices in Wisconsin.

2. AstraZeneca objects to the Interrogatories and Requests to the extent that they are overly broad, unduly burdensome, ambiguous, or vague, are not described with reasonable particularity, lack a readily discernible meaning, and/or require AstraZeneca to speculate as to the information sought.

3. AstraZeneca objects to the Interrogatories and Requests on the ground that they are unduly burdensome to the extent that they purport to require AstraZeneca to compile, analyze, compute, and/or summarize voluminous data or information for Plaintiff.

4. AstraZeneca objects to the Interrogatories and Requests to the extent that responding to them would involve unreasonable expense.

5. AstraZeneca objects to the Interrogatories and Requests to the extent that they seek to impose obligations broader than, or inconsistent with, AstraZeneca's obligations under the Wisconsin Rules of Civil Procedure or other applicable law.

6. AstraZeneca objects to the Interrogatories and Requests to the extent that they call for the production of information or documents that are protected from disclosure by the work-product doctrine, attorney-client privilege, accountant-client privilege, consulting expert privilege, investigative privileges, any common interest or joint defense agreement, or any other applicable privilege or protection. To the extent that any such protected material is inadvertently disclosed or produced in response to the Interrogatories and Requests, the disclosure or production of such material shall not constitute a waiver of AstraZeneca's right to assert the applicability of any privilege or immunity to the material, and AstraZeneca demands that any such material be returned to AstraZeneca's counsel immediately upon discovery thereof.

7. AstraZeneca objects to the Interrogatories and Requests to the extent that they seek admissions as to legal conclusions.

8. AstraZeneca objects to the Interrogatories and Requests to the extent that they call for the production of information or documents not within its possession, custody, or control or that are more appropriately sought from third parties to whom requests have been or may be directed. AstraZeneca further objects to the Interrogatories and Requests to the extent that they request admission of matters not within AstraZeneca's knowledge and to the extent that they request admission of matters for which Plaintiff bears the burden of proof.

9. AstraZeneca objects to the Interrogatories and Requests to the extent that they seek disclosure of information or documents that are publicly available, equally available to the Plaintiff, or already in the possession, custody, or control of the Plaintiff.

10. AstraZeneca objects to the Interrogatories and Requests to the extent that they call for the disclosure of proprietary, commercially sensitive, or other confidential information, the

probative value of which is outweighed by AstraZeneca's interest in preserving its confidentiality. Any such materials produced will be subject to the Protective Order entered in this matter. AstraZeneca further objects to the disclosure, under any circumstance, of trade secret information and hereby asserts each and every applicable privilege and rule governing confidentiality to the fullest extent provided by law.

11. AstraZeneca objects to the Interrogatories and Requests as overly broad and unduly burdensome to the extent that they call for the identification of "each," "any," or "all" when relevant information can be obtained from fewer than "each," "any," or "all."

12. AstraZeneca objects to the Interrogatories and Requests to the extent that they are not limited to the drugs at issue in this action.

13. AstraZeneca objects to the Interrogatories and Requests to the extent that they seek information or documents from outside the statute of limitations applicable to the claims in this action or beyond the time period relevant to this action.

14. AstraZeneca objects to any implication and to any explicit or implicit characterization of facts, events, circumstances, or issues in the Interrogatories and Requests. AstraZeneca's responses to the Interrogatories and Requests shall not be construed as admissions to any legal conclusion, or that any explicit or implicit characterization of the facts, events, circumstances, or issues contained in the Interrogatories and Requests are relevant to this action.

15. AstraZeneca objects to the Interrogatories and Requests to the extent that they are argumentative.

16. AstraZeneca objects to Plaintiff's use of terms or phrases that are never defined on the ground that it renders the relevant requests vague and ambiguous.

17. AstraZeneca reserves the right to assert additional objections to the Interrogatories and Requests as appropriate and to amend or supplement these responses and objections in accordance with the applicable rules and court orders. AstraZeneca also reserves the right to object to the use of any of its responses at trial or other hearing or proceeding, as AstraZeneca deems necessary and appropriate. To the extent that AstraZeneca may provide information or documents in response to any Interrogatory or Request herein, AstraZeneca does so without limiting or waiving any of the substantive objections it may otherwise have available.

18. AstraZeneca hereby incorporates by reference, as if fully set forth herein, any objection or reservation of rights made by any co-defendant in this action to the extent that such objection or reservation of rights is not inconsistent with AstraZeneca's position in this action.

OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS

AstraZeneca makes the following objections to Plaintiff's definitions and instructions in the Interrogatories and Requests, which are incorporated by reference in each and every specific response below:

1. AstraZeneca objects to the definition of "document" as set forth in Definition No. 1 on the grounds that it is vague and ambiguous. AstraZeneca also objects to this definition to the extent it seeks to impose discovery obligations that are broader than, or inconsistent with, AstraZeneca's obligations under the Wisconsin Rules of Civil Procedure or other applicable law. AstraZeneca further objects to this definition to the extent that requires or seeks to require AstraZeneca: (i) to produce documents or data in a particular form or format; (ii) to convert documents or data into a particular or different file format; (iii) to produce data, fields, records, or reports about produced documents or data; (iv) to produce documents or data on any particular

media; (v) to search for and/or produce any documents or data on back-up tapes; (vi) to produce any proprietary software, data, programs, or databases; or (vii) to violate any licensing agreement or copyright laws.

2. AstraZeneca objects to the definition of “identify” as set forth in Definition No. 2 on the grounds that, taken together with the Requests and Interrogatories, this term is overly broad and unduly burdensome.

3. AstraZeneca objects to the definition of “incentive” as set forth in Definition No. 3 on the grounds that it is overly broad, unduly burdensome, ambiguous, vague, and argumentative.

4. AstraZeneca objects to the definition of “you,” and “your” as set forth in Definition No. 4 on the grounds that it is overly broad, unduly burdensome, vague, and ambiguous. AstraZeneca further objects to this definition to the extent that it purports to impose discovery obligations that are broader than, or inconsistent with, AstraZeneca’s obligations under the Wisconsin Rules of Civil Procedure or other applicable law. AstraZeneca objects to this definition to the extent that it seeks to impose an obligation on AstraZeneca to provide information that is not in the possession, custody, or control of AstraZeneca, and insofar as it purports to require AstraZeneca to speculate concerning the identities of individuals and business entities included in these definitions. AstraZeneca also objects to this definition to the extent that it purports to require AstraZeneca to search files other than its own and seeks the production of information and documents protected from disclosure under the attorney-client privilege, the work-product doctrine, the joint defense privilege, the common interest doctrine, or any other legally recognized privilege, immunity or exemption from discovery.

5. AstraZeneca objects to the Instructions for Interrogatories on the ground that they are unduly burdensome. AstraZeneca further objects to these Instructions to the extent that they purport to impose discovery obligations that are broader than, or inconsistent with, AstraZeneca's obligations under the Wisconsin Rules of Civil Procedure or other applicable law. AstraZeneca also objects to these Instructions to the extent that they seek information in the possession of AstraZeneca's "attorneys," and "anyone else subject to ... [AstraZeneca's] attorneys' control."

6. AstraZeneca objects to the Instructions for Requests for Production of Documents on the ground that they are unduly burdensome. AstraZeneca further objects to these Instructions to the extent that they purport to impose discovery obligations that are broader than, or inconsistent with, AstraZeneca's obligations under the Wisconsin Rules of Civil Procedure or other applicable law.

7. AstraZeneca objects to the Instructions for Requests for Admissions to the extent that they purport to impose discovery obligations that are broader than, or inconsistent with, AstraZeneca's obligations under the Wisconsin Rules of Civil Procedure or other applicable law.

SPECIFIC RESPONSES AND OBJECTIONS

Subject to the foregoing General Objections and Objections to Definitions and Instructions, and without waiving and expressly preserving all such objections that are incorporated by reference in each and every response below, AstraZeneca responds to the Interrogatories and Requests as follows:

CONSOLIDATED DISCOVERY REQUEST NO. 1

REQUEST FOR ADMISSION NO. 1: At no time has the State of Wisconsin, its Department of Health & Family Services, or any employee thereof, explicitly approved your practice of reporting to First DataBank average wholesale prices (“AWPs”) for your drugs that were not the true average prices charged by wholesalers to their customers for your drugs.

ANSWER: In addition to its General Objections, which are incorporated herein by reference, AstraZeneca objects to Request for Admission No. 1 on the grounds that it falsely implies that “the State of Wisconsin, its Department of Health & Family Services, or any employee thereof” were supposed to “approve” the suggested AWP’s provided by AstraZeneca to First DataBank prior to 2002. AstraZeneca also objects to this Request to the extent that it falsely implies that AWP was intended to equal an average price charged by wholesalers to their customers and that AstraZeneca had access to such information.

Subject to and without waiving its General and Specific Objections, AstraZeneca denies Request for Admission No. 1, and states that it has been widely known for decades, including by state Medicaid agencies such as that in the State of Wisconsin, that published AWP’s are not mathematical averages of prices paid by pharmacies but rather reimbursement benchmarks that exceed pharmacy acquisition costs and are calculated by adding a standard 20% or 25% mark-up to the list prices, also known as WACs, for branded pharmaceutical products.

INTERROGATORY NO. 1: If your response to Request for Admission No. 1 is anything other than an unqualified admission, state all bases for your response, including the following:

- (a) identify whether the approval was made verbally or in writing;**
- (b) identify the person(s) who approved the practice;**
- (c) identify the date(s) on which the approval was made;**
- (d) state whether the approval was communicated to you;**
- (e) if the approval was communicated to you, state whether the communication was made verbally or in writing;**
- (f) if the approval was communicated to you, identify the date of such communication(s);**
- (g) if the approval was communicated to you, identify the person(s) who made the**

- communication(s);**
- (h) if the approval was communicated to you, identify the person(s) who received the communication(s);**
 - (i) identify all documents relating to the approval of the practice;**
 - (j) identify all documents relating to the communication of the approval to you.**

ANSWER: Subject to and without waiving its General Objections, AstraZeneca incorporates by reference its Response to Request for Admission No. 1. By way of further response, AstraZeneca states that documents reflecting the well-known fact that AWP's were not averages of prices charged by wholesalers to their customers include reports from various branches of the federal government and documents from the files of various agencies of the State of Wisconsin. By way of further response, AstraZeneca states that Wisconsin Medicaid had access to extensive information concerning pharmacy acquisition costs, including, pharmacists, rebate information, reports by federal agencies and third parties, manufacturers and wholesalers, pharmacies, Average Sales Price data supplied by AstraZeneca to the State for certain of its drugs during the relevant time period, other state entities that purchased pharmaceuticals, other state programs that reimbursed for pharmaceuticals, and many other sources. This information indicated that AWP's are not mathematical averages of prices paid by pharmacies. Armed with this extensive information and knowledge concerning pharmacy acquisition costs and the meaning of AWP, Wisconsin Medicaid periodically considered alternative pharmaceutical reimbursement methodologies, but voluntarily chose to continue to reimburse pharmacies for branded pharmaceuticals based on published First DataBank AWP's.

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 1: Produce all documents identified in your Response to Interrogatory No. 1.

ANSWER: Subject to and without waiving its General Objections, AstraZeneca incorporates by reference its Response to Request for Admission No. 1. By way of further

response, AstraZeneca states that this Request seeks documents or information equally available to Plaintiff or already in Plaintiff's custody or control.

CONSOLIDATED DISCOVERY REQUEST NO. 2

REQUEST FOR ADMISSION NO. 2: At no time has the State of Wisconsin, its Department of Health and Family Services, or any employee thereof, explicitly approved your practice of reporting to First DataBank suggested wholesale prices ("SWPs") for your drugs that were not the true average prices charged by wholesalers to their customers.

ANSWER: In addition to its General Objections, which are incorporated herein by reference, AstraZeneca objects to Request for Admission No. 2 on the grounds that SWPs are not relevant to Plaintiff's claims because the State did not use SWPs as a basis for reimbursement in the Wisconsin Medicaid Program. Subject to and without waiving its General and Specific Objections, AstraZeneca denies Request for Admission No. 2, except incorporates herein its response to Request for Admission No. 1.

INTERROGATORY NO. 2: If your response to Request for Admission No. 2 is anything other than an unqualified admission, state all bases for your response, including the following:

- (a) identify whether the approval was made verbally or in writing;**
- (b) identify the person(s) who approved the practice;**
- (c) identify the date(s) on which the approval was made;**
- (d) state whether the approval was communicated to you;**
- (e) if the approval was communicated to you, state whether the communication was made verbally or in writing;**
- (f) if the approval was communicated to you, identify the date of such communication(s);**
- (g) if the approval was communicated to you, identify the person(s) who made the communication(s);**
- (h) if the approval was communicated to you, identify the person(s) who received the communication(s);**
- (i) identify all documents relating to the approval of the practice;**
- (j) identify all documents relating to the communication of the approval to you.**

ANSWER: Subject to and without waiving its General Objections, AstraZeneca incorporates by reference its Response to Request for Admission No. 2 and its Response to Interrogatory No. 1.

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 2: Produce all documents identified in your Response to Interrogatory No. 2.

ANSWER: Subject to and without waiving its General Objections, AstraZeneca incorporates by reference its Response to Request for Admission No. 2. By way of further response, AstraZeneca states that this Request seeks documents or information equally available to Plaintiff or already in Plaintiff's custody or control.

CONSOLIDATED DISCOVERY REQUEST NO. 3

REQUEST FOR ADMISSION NO. 3: At no time has the State of Wisconsin, its Department of Health and Family Services, or any employee thereof, explicitly approved your practice of reporting to First DataBank wholesale acquisition costs ("WACs") for your drugs that were not the true average prices, net of discounts, rebates, chargebacks, and incentives, paid by wholesalers to you.

ANSWER: In addition to its General Objections, which are incorporated herein by reference, AstraZeneca objects to Request for Admission No. 3 on the grounds that it is vague and ambiguous. AstraZeneca objects to this Request on the grounds that it falsely implies that "the State of Wisconsin, its Department of Health and Family Services, or any employee thereof" were supposed to "approve" AstraZeneca's WACs. AstraZeneca also objects to this Request to the extent it falsely implies that WAC was intended to equal the net amount paid by wholesalers. Subject to and without waiving its General and Specific Objections, AstraZeneca denies Request for Admission No. 3, and states that it has been widely known, including by state Medicaid agencies such as that in the State of Wisconsin, that WAC is a list price for pharmaceutical products that does not include "discounts, rebates, chargebacks and incentives."

INTERROGATORY NO. 3: If your response to Request for Admission No. 3 is anything other than an unqualified admission, state all bases for your response, including the following:

- (a) identify whether the approval was made verbally or in writing;
- (b) identify the person(s) who approved the practice;
- (c) identify the date(s) on which the approval was made;
- (d) state whether the approval was communicated to you;
- (e) if the approval was communicated to you, state whether the communication was made verbally or in writing;
- (f) if the approval was communicated to you, identify the date of such communication(s);
- (g) if the approval was communicated to you, identify the person(s) who made the communication(s);
- (h) if the approval was communicated to you, identify the person(s) who received the communication(s);
- (i) identify all documents relating to the approval of the practice;
- (j) identify all documents relating to the communication of the approval to you.

ANSWER: Subject to and without waiving its General Objections, AstraZeneca incorporates by reference its Response to Request for Admission No. 3. By way of further response, AstraZeneca states that documents reflecting the well-known fact that WAC is a list price include federal statutes, reports from various branches of the federal government and documents from the files of various agencies of the State of Wisconsin.

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 3: Produce all documents identified in your Response to Interrogatory No. 3.

ANSWER: Subject to and without waiving its General Objections, AstraZeneca incorporates by reference its Response to Request for Admission No. 3. By way of further response, AstraZeneca states that this Request seeks documents or information equally available to Plaintiff or already in Plaintiff's custody or control.

CONSOLIDATED DISCOVERY REQUEST NO. 4

REQUEST FOR ADMISSION NO. 4: The average wholesale prices ("AWPs") that you reported to First DataBank for your drugs were not the true average prices charged by wholesalers to their customers for your drugs. Rather, the AWPs that you reported to

First DataBank for your drugs were more than the true average prices charged by wholesalers to their customers for your drugs.

ANSWER: In addition to its General Objections, which are incorporated herein by reference, AstraZeneca objects to Request for Admission No. 4 on the grounds that it is vague, ambiguous, and misleading in purporting to compare sales to customers of wholesalers with AWP. AstraZeneca further objects to this Request to the extent that it falsely implies that AstraZeneca sets AWP. AstraZeneca does not set AWPs; AWPs are set by independent third-party publishers. AstraZeneca also objects to this Request to the extent that it falsely implies that AWP was intended to equal an actual price paid by customers of wholesalers. AstraZeneca states that it has been widely known for decades, including by state Medicaid agencies such as that in the State of Wisconsin, that AWPs are not mathematical averages of prices paid by pharmacies or doctors but rather reimbursement benchmarks that exceed acquisition costs and are calculated by adding a standard 20% or 25% mark-up to the list prices, also known as WACs, for branded pharmaceutical products. Based upon its General and Specific Objections, AstraZeneca denies Request for Admission No. 4, except to state that AstraZeneca generally sells its pharmaceuticals to wholesalers. Wholesalers, in turn, sell pharmaceutical products manufactured by AstraZeneca to their customers. AstraZeneca is generally not involved in discussions between wholesalers and their customers. The purchase prices for those transactions are the result of negotiations between wholesalers and their customers, which are wholly independent of AstraZeneca's involvement. As a result, AstraZeneca is generally not aware of the prices that the customers of wholesalers pay for AstraZeneca's products. Notwithstanding, AstraZeneca states that as indicated by the information on acquisition costs to which Wisconsin Medicaid had access (including information from other state entities that purchased

pharmaceuticals, other state programs that reimbursed for pharmaceuticals, pharmacists, rebate information, reports by federal agencies and third parties, information supplied by manufacturers and wholesalers, information supplied by pharmacies, and many other sources), the State was aware that the prices paid by these customers were less than the AWP published by First DataBank.

INTERROGATORY NO. 4: If your response to Request for Admission No. 4 is anything other than an unqualified admission, state all bases for your response and identify all documents that support or relate to your response.

ANSWER: Subject to and without waiving its General and Specific Objections, AstraZeneca incorporates by reference its Response to Request for Admission No. 4.

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 4: Produce all documents identified in your Response to Interrogatory No. 4.

ANSWER: Subject to and without waiving its General and Specific Objections, AstraZeneca incorporates by reference its Response to Request for Admission No. 4.

CONSOLIDATED DISCOVERY REQUEST NO. 5

REQUEST FOR ADMISSION NO. 5: The suggested wholesale prices (“SWPs”) that you reported to First DataBank for your drugs were not the true average prices charged by wholesalers to their customers for your drugs. Rather, the SWPs that you reported to First DataBank for your drugs were more than the true average prices charged by wholesalers to their customers for your drugs.

ANSWER: In addition to its General Objections, which are incorporated herein by reference, AstraZeneca objects to Request for Admission No. 5 on the grounds that the values for any SWPs are not relevant to Plaintiff’s claims because the State did not use SWP for reimbursement in the Wisconsin Medicaid Program. AstraZeneca also objects to this Request to the extent that it falsely implies that the suggested AWP provided by AstraZeneca prior to 2002 were intended to equal actual prices paid by customers of wholesalers. Those suggested AWP

were simply a mathematical calculation of the 20% or 25% mark-up over the list prices, also known as WACs, typically applied by the publishers consistent with well-known industry practice. Based upon its General and Specific Objections, AstraZeneca denies Request for Admission No. 5, except incorporates by reference its Response to Request for Admission No. 4.

INTERROGATORY NO. 5: If your response to Request for Admission No. 5 is anything other than an unqualified admission, state all bases for your response and identify all documents that support or relate to your response.

ANSWER: Subject to and without waiving its General and Specific Objections, AstraZeneca incorporates by reference its Response to Request for Admission No. 5.

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 5: Produce all documents identified in your Response to Interrogatory No. 5.

ANSWER: Subject to and without waiving its General and Specific Objections, AstraZeneca incorporates by reference its Response to Request for Admission No. 5.

CONSOLIDATED DISCOVERY REQUEST NO. 6

REQUEST FOR ADMISSION NO. 6: The wholesale acquisition costs (“WACs”) that you reported to First DataBank for your drugs were not the true average prices, net of discounts, rebates, chargebacks, and incentives, paid by wholesalers to you for your drugs. Rather, the WACs that you reported to First DataBank for your drugs were more than the true average prices, net of discounts, rebates, chargebacks, and incentives, paid by wholesalers to you for your drugs.

ANSWER: In addition to its General Objections, which are incorporated herein by reference, AstraZeneca objects to Request for Admission No. 6 on the grounds that it is vague and ambiguous. AstraZeneca also objects to this Request to the extent that it falsely implies that WAC was intended to equal the net amount paid by wholesalers. AstraZeneca states that it is widely known, including by state Medicaid agencies such as that in the State of Wisconsin, that WAC is a list price for pharmaceutical products that does not include minimal, customary prompt-pay discounts or stocking incentive payments. Documents reflecting these well-known

facts include federal statutes, reports from various branches of the federal government and documents from the files of various agencies of the State of Wisconsin. Based upon its General and Specific Objections, AstraZeneca denies Request for Admission No. 6, except states that AstraZeneca charged wholesalers the reported WAC price on the invoice that AstraZeneca sent to these customers. AstraZeneca typically offered its customers an industry-standard “prompt-pay” discount (which has been recognized by the federal Medicaid statute since 1991), which could be earned by the customer if it paid AstraZeneca within a specified period. In addition, consistent with well-known industry practice, there were also one-time stocking incentive payments offered to certain wholesalers in connection with the launch of a new product

INTERROGATORY NO. 6: If your response to Request for Admission No. 6 is anything other than an unqualified admission, state all bases for your response and identify all documents that support or relate to your response.

ANSWER: In addition to its General Objections, which are incorporated herein by reference, AstraZeneca objects to Interrogatory No. 6 on the grounds that it is overly broad, unduly burdensome, vague, and ambiguous. Subject to and without waiving its General and Specific Objections, AstraZeneca incorporates herein its response to Request for Admission No. 6. AstraZeneca states that all sales to wholesalers were at the published WAC price. Wholesalers were entitled to a 2% prompt-pay credit discount and, from time to time, one-time stocking incentives offered in connection with product launches. AstraZeneca further states that it has produced sales transaction data for each AstraZeneca NDC at issue in this litigation as well as other documents concerning AstraZeneca’s sales to wholesalers. AstraZeneca also refers Plaintiff to the wholesaler transactional data produced by third parties.

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 6: Produce all documents identified in your Response to Interrogatory No. 6.

ANSWER: Subject to and without waiving its General and Specific Objections,

AstraZeneca incorporates by reference its Response to Request for Admission No. 6.

Dated this 16th day of June, 2008.

By:



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VERIFICATION

I, Stuart Fullerton, am the Senior Litigation Counsel for AstraZeneca Pharmaceuticals LP. I have been authorized by AstraZeneca Pharmaceuticals LP and AstraZeneca LP to provide this verification on their behalf. I have reviewed the above answers to Interrogatories, which were prepared in reliance on information from officers, agents, employees and/or records of AstraZeneca Pharmaceuticals LP and AstraZeneca LP. The answers are true and correct to the best of my knowledge, information and belief.

Stuart Fullerton

Subscribed and sworn to before me
this ____ day of June, 2008.

Notary Public, State of Delaware

My Commission Expires:

Certificate of Service

I, Barbara A. Neider , hereby certify that on this 16th day of June 2008, a true and correct copy of **ASTRAZENECA'S RESPONSES AND OBJECTIONS TO PLAINTIFF'S FIRST CONSOLIDATED SET OF INTERROGATORIES, REQUESTS FOR ADMISSIONS AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO ALL DEFENDANTS** was served on all counsel of record by Lexis Nexis File & Serve®.

/s/ Barbara A. Neider
Barbara A. Neider