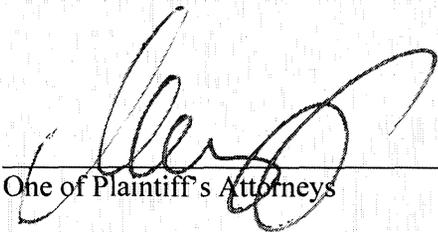


3. What contacts Baxter Healthcare Corp., or its subsidiaries, have had with First Data Bank or the Red Book about any of the deposition drugs.
4. Whether Baxter Healthcare Corp., or any of its subsidiaries, ever communicated to either First Data Bank or the Red Book that the published Average Wholesale Prices of their drugs were neither a price that was actually an average of wholesale prices, nor a price that was actually paid by the retail classes of trade and, if so, when such communications took place and of what they consisted.
5. The Average Manufacturer's Price (AMP) reported to the federal government of each of the targeted drugs in each year since 1993.
6. Any evidence which shows that the actual average wholesale price at which any of the targeted drugs sold in any given year was greater than the AMP.

The designated deponents shall bring with them 1) all evidence or information showing that any of the targeted drugs was sold at a price equal to or greater than the published AWP from 1993 to the present, 2) for the same period all evidence or information showing that actual average wholesale prices of its targeted drugs were less than the published AWP, 3) for the same time period any evidence of communications between Baxter Healthcare Corp. and the Red Book about or concerning any of the targeted drugs, 4) for the same time period the reported AMPs of each targeted drug, and, 5) for the same time period any evidence defendant has showing that the actual average wholesale price of any of the targeted drugs was greater than the reported AMP.

Dated this 1st day of September, 2006.



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Deposition Drugs

BUMETANIDE	10019-0048-03
10019-0506-02	IVEEGAM
10019-0506-10	64193-0250-50
10019-0506-45	METRONIDAZOLE
BUPIVACAINE/SODIUM	00338-1055-48
00338-9389-48	NAFCILLIN
00338-9390-48	00338-1017-41
00338-9391-48	00338-1019-48
00338-9392-02	PROPOFOL
00338-9393-41	10019-0013-01
00338-9394-48	10019-0013-02
DEXTROSE	10019-0013-03
00338-0015-01	10019-0013-04
00338-0016-02	10019-0013-06
00338-0016-03	10019-0213-01
00338-0017-01	10019-0213-02
00338-0017-02	10019-0213-03
00338-0017-03	SODIUM
00338-0017-04	00338-0043-04
00338-0017-10	00338-0044-02
00338-0017-11	00338-0044-03
00338-0017-18	00338-0048-02
00338-0017-31	00338-0048-03
00338-0017-38	00338-0048-04
00338-0017-41	00338-0048-05
00338-0017-48	00338-0049-01
00338-0077-04	00338-0049-02
00338-0085-04	00338-0049-03
00338-0551-11	00338-0049-04
00338-0551-18	00338-0049-10
00338-0669-04	00338-0049-11
00338-0671-04	00338-0049-18
00338-0719-06	00338-0049-31
DEXTROSE/SODIUM	00338-0049-38
00338-0089-02	00338-0049-41
00338-0089-03	00338-0049-48
00338-0089-04	00338-0553-11
FAMOTIDINE	00338-0553-18
00338-5197-41	00338-8019-70
10019-0045-01	00338-8020-72
10019-0045-02	STERILE
10019-0046-02	00338-0004-02
10019-0046-03	00338-0004-03
10019-0046-04	00338-0004-04
10019-0047-01	00338-0013-04
10019-0048-02	00338-0013-06