

STATE OF WISCONSIN,)
 Plaintiff,)
)
 v.)
)
 AMGEN INC., ET AL.,)
 Defendants.)

Case No.: 04 CV 1709

**NOTICE OF MOTION OF ASTRAZENECA PHARMACEUTICALS LP AND
 ASTRAZENECA LP FOR A PROTECTIVE ORDER LIMITING DISCOVERY**

PLEASE TAKE NOTICE that Defendants AstraZeneca Pharmaceuticals LP and AstraZeneca LP will bring the following motion at a time and date to be determined by the Special Master, the Honorable William Eich.

MOTION

Defendants AstraZeneca Pharmaceuticals LP and AstraZeneca LP (“AstraZeneca”) move the court for a protective order pursuant to Wis. Stat. § 804.01(3)(a), restricting the discovery that the State is entitled to obtain to the following, pending further order of the court:

1. The transactional sales and rebate data which was produced in the MDL Proceeding relating to 15 of the products on the State’s list of “targeted drugs,” which include Accolate, Arimidex, Atacand, Casodex, Diprivan, Nexium, Nolvadex, Prilosec, Pulmicort, Rhinocort, Seroquel, Toprol, Zestril, Zoladex and Zomig, and amounts to approximately 17 million transactional records.
2. The IMS data produced in the MDL Proceeding, which currently includes data relating to Zoladex® and Pulmicort®.

3. The 440,000 pages of text-searchable documents regarding Zoladex®, the one AstraZeneca drug referenced in the Complaint, previously produced in the MDL Proceeding.

4. The approximately 31,000 pages of text-searchable documents produced in the MDL Proceeding from AstraZeneca's Pricing Strategy Group.

The grounds for this motion are that the State's discovery requests in the Plaintiff's First Set of Interrogatories to All Defendants and Plaintiff's First Request for Production of Documents to All Defendants are overly broad, unduly burdensome and not calculated to lead to the discovery of admissible evidence.

This motion is supported by the brief and affidavits which AstraZeneca filed on December 16, 2005, in opposition to the State's Motion to Compel AstraZeneca to Respond to Plaintiff's First Set of Interrogatories to All Defendants and Plaintiff's First Request for Production of Documents to All Defendants, dated November 23, 2005.

Dated: December 16, 2005.

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