

3. The State is entitled to full and complete responses to all discovery requests with respect to each of the drugs at issue. Moreover, the AstraZeneca Defendants are obligated to produce only those documents responsive to the State's narrowly tailored discovery requests, rather than bury responsive document in a heap of non-responsive ones.

4. The State respectfully asks this Court to compel full and proper responses to its discovery requests and to award the State its costs and fees associated with bringing this motion as well as the fees of the Special Discovery Master (SDM), pursuant to the authority granted the SDM in para. 2(a) of the Court's Order of June 23, 2005.

Dated this 23rd day of November, 2005.



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