



interrogatory answer. Novartis's position is particularly troubling in light of the fact that Novartis withheld the deposition from the State for more than six months from the time it first told the State that it would produce it.

3. The State respectfully asks this Court to compel Novartis to answer Interrogatory No. 1 and produce all documents responsive to Request for Production of Documents No. 4 and to award the State its costs and fees associated with bringing this motion.

Dated this 7<sup>th</sup> day of March, 2006.

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