

3. Prior to bringing this motion, Pfizer attempted in good faith to resolve this dispute by permitting Plaintiff to obtain the information it seeks in a cost-effective manner. *See* McCall Decl., ¶¶ 2 and 4. Plaintiff rejected that offer and, instead, insisted that Pfizer have witnesses travel to Wisconsin to provide live testimony at a deposition. *See id.*, ¶ 5.

4. To permit this deposition to go forward would require Pfizer to educate one or more Pfizer employees on 10 years of the history, structure, and operations of another company. Pfizer could not educate an employee to testify on 10 years of its own history, structure, and operations and it cannot do so for a different company.

5. The undue burden and expense of preparing witnesses to travel to Wisconsin to testify about eighteen subject matters that relate to another company and cover a 10-year period of time is extremely high, particularly in light of the fact that, to the extent known, these requests for information would be more efficiently discovered through interrogatories.

For the foregoing reasons, Pfizer requests the Court grant its Motion for a Protective Order under Wis. Stats. § 804.01(3)(a).

This Motion is supported by Pfizer Inc.'s Memorandum in Support of its Motion for a Protective Order and the affidavit of Jamie M. McCall.

Dated this 4th day of March, 2008.



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CERTIFICATE OF SERVICE

I, Beth J. Kushner, hereby certify that on this day of 4th day of March 2008, a true and correct copy of "Pfizer Inc.'s Notice of Motion and Motion for a Protective Order" was served on all counsel of record by Lexis Nexis File & Serve®.
