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October 5, 2005

Hon. Moria Krueger
Circuit Court Judge, Branch 7
Dane County Circuit Court
City County Building
210 Martin Luther King Jr. Blvd., Rm. 330
Madison WI 53703-3342

Via Hand Delivery

Re: *State of Wisconsin v. Amgen Inc, et al.*
Dane County Case Number: 04-CV-1709

Dear Judge Krueger:

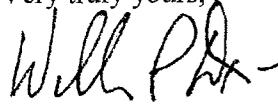
Enclosed please find the following documents submitted in this matter:

1. Motion To Compel Defendant Sandoz, Inc. To Respond To Plaintiff's First Set Of Interrogatories To All Defendants And Plaintiff's First Set Of Requests For Production Of Documents To All Defendants;
2. Memorandum In Support Of Motion To Compel Defendant Sandoz, Inc. To Respond To Plaintiff's First Set Of Interrogatories To All Defendants And Plaintiff's First Set Of Requests For Production Of Documents To All Defendants;
3. Affidavit Of William P. Dixon;
4. Certificate of Service; and
5. (Proposed) Order.

Hon. Moria Krueger
Circuit Court Judge, Branch 7
Page Two
October 5, 2005

The Court is respectfully requested to schedule the Motion at an appropriate time pursuant to the Court's availability.

Very truly yours,

A handwritten signature in black ink, appearing to read "Will P. Dixon", with a horizontal line extending from the end of the signature.

William P. Dixon

WPD;jlz

Enclosures

COPY

STATE OF WISCONSIN

CIRCUIT COURT
BRANCH 7
2005 OCT 5 PM 1:57

DANE COUNTY

STATE OF WISCONSIN,

DANE CO. CIRCUIT COURT

Plaintiff,

v.

Case No. 04-CV-1709
Unclassified – Civil:30703

AMGEN INC., et al.,

Defendants.

**MOTION TO COMPEL DEFENDANT SANDOZ, INC. TO RESPOND TO
PLAINTIFF'S FIRST SET OF INTERROGATORIES AND FIRST SET OF REQUESTS
FOR PRODUCTION OF DOCUMENTS TO ALL DEFENDANTS**

1. Pursuant to Wis. Stat. § 804.12 (1), Plaintiff State of Wisconsin ("the State") moves this Court to compel Defendant Sandoz, Inc. ("Sandoz") to respond and provide full answers to Plaintiff's First Set of Requests for Production of Documents and Plaintiff's First Set of Interrogatories.

2. The State's discovery requests are narrowly tailored and highly relevant to the matters at issue in this case. Sandoz has wrongfully refused to produce documents or respond substantively to any of the State's discovery requests.

3. The State respectfully asks this Court to compel full responses to their discovery requests and to award the State its costs and fees associated with bringing this motion.

Dated this 5th day of October, 2005.

One of Plaintiff's Attorneys

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COPY

STATE OF WISCONSIN

CIRCUIT COURT

DANE COUNTY

Branch 7

2005 OCT -5 PM 1:58

STATE OF WISCONSIN,

DANE CO. CIRCUIT COURT

Plaintiff,

v.

AMGEN INC., et al.,

Defendants.

Case No. 04-CV-1709

Unclassified - Civil: 30703

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of Motion To Compel Defendant Sandoz, Inc. To Respond To Plaintiff's First Set Of Interrogatories To All Defendants and Plaintiff's First Set Of Requests For Production Of Documents To All Defendants, Memorandum In Support Of Motion To Compel Defendant Sandoz, Inc. To Respond To Plaintiff's First Set Of Interrogatories To All Defendants and Plaintiff's First Set Of Requests For Production Of Documents To All Defendants, and Affidavit of William P. Dixon to be served by U.S. mail upon the attorneys listed on the attached document on October 5, 2005.

I also certify that I caused a true and correct copy of this document to be electronically served upon Daniel W. Hildebrand, dwh@dewittross.com for circulation to other interested counsel.

Dated this 5th day of October, 2005.

William P. Dixon

William P. Dixon

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