
STATE OF WISCONSIN,

Plaintiff,

v.

Case No.: 04-CV-1709

ABBOTT LABORATORIES, ET AL.,

Defendants.

**PLAINTIFF'S SECOND SET OF REQUESTS FOR PRODUCTION
OF DOCUMENTS TO TAP PHARMACEUTICAL PRODUCTS, INC.**

To: See Attached Service List

PLEASE TAKE NOTICE that the Plaintiff requires Defendant, TAP Pharmaceutical Products, Inc. to produce within thirty (30) days hereof at the offices of the Wisconsin Attorney General, Wisconsin, Department of Justice, Post Office Box 7857, Madison, Wisconsin 53707-7857 Attn: Cynthia Hirsch and the Miner, Barnhill & Galland, P.C., 44 East Mifflin Street, Suite 803, Madison, WI 53703 Attn: Charles Barnhill a copy of each of the following described Documents pursuant to Rule 804.09:

DEFINITIONS

As used in these Document Requests, the following terms shall have the meanings set forth below:

1. The term "Document" means any writing or recording of any kind, including, without limitation, agendas, agreements, analyses, announcements, audits, booklets, books, brochures, calendars, charts, contracts, correspondence, facsimiles (faxes), film, graphs, letters, memos, maps, minutes (particularly Board of Directors and/or Executive Committee meeting minutes), notes, notices, photographs, reports, schedules, summaries, tables, and telegrams, in any medium, whether written, graphic, pictorial, photographic, electronic, emails, phonographic, mechanical, taped, saved on computer

disc, hard drives, data tapes, or otherwise, and every non-identical copy. Different versions of the same Document, such as different copies of a written record bearing different handwritten notations, are different Documents within the meaning of the term as used. In case originals or original non-identical copies are not available, "Document" includes copies of originals or copies of non-identical copies as the case may be.

REQUEST FOR PRODUCTION OF DOCUMENTS

REQUEST NO. 1: Produce each document or thing which was identified by, or exchanged with, any party to the litigation styled *Walker v. TAP Pharmaceutical Products, Inc.*, Case No. CPM L-682-01 (in the Superior Court, Cape May, New Jersey) as a trial exhibit or as a potential trial exhibit, and any document which had the purpose or effect of identifying one or more documents or things as a potential trial exhibit to another party in the litigation.

REQUEST NO. 2: Produce the deposition testimony of any witness taken in the case styled *Walker v. TAP Pharmaceutical Products, Inc.*, Case No. CPM L-682-01 (in the Superior Court, Cape May, New Jersey) or any other sworn statement exchanged in discovery with any other party to that case, regardless of the manner in which the statement was obtained.

REQUEST NO. 3: Produce the deposition testimony of any witness taken in the case styled *In re: LUPRON MARKETING AND SALES PRACTICES LITIGATION*; MDL No. 1430, Master File No. 01-CV-10861; (in the United States District Court, District of Massachusetts) or any other sworn statement exchanged in discovery with any other party to that case, regardless of the manner in which the statement was obtained.

Dated this 13th day of June, 2005.



One of Plaintiff's Attorneys

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