

IN THE CIRCUIT COURT OF DANE COUNTY

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STATE OF WISCONSIN,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Case No. 04 CV 1709
	:	
ABBOTT LABORATORIES, ET AL.	:	
	:	
Defendants	:	
	:	
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**Defendant Aventis Pharmaceuticals Inc.’s  
First Request for Production of Documents Directed to Plaintiff**

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Pursuant to Chapter 804 of the Wisconsin Statutes, Defendant Aventis Pharmaceuticals, Inc. (“Aventis”) requests the State of Wisconsin (“Plaintiff”) respond to the following Requests for Production of Documents (the “Requests”) no later than 30 days from date of service. In addition to Defendants’ Second Set of Document Requests, Aventis submits the following Aventis-specific Requests.

**DEFINITIONS**

Defendant Aventis hereby incorporates the definitions contained in Defendants’ Second Set of Requests for Production of Documents and Interrogatories Directed to Plaintiff, served on February 20, 2006. In addition, the following terms used in these Requests are defined as follows:

1. “**Aventis**” means Aventis Pharmaceuticals Inc. and its predecessors in interest including, but not limited to, Hoechst Marion Roussel, Inc. and Rhône-Poulenc Rorer Inc. and, where appropriate, each of their respective employees, officers, representatives and agents.

2. “**Subject Drugs**” means any Aventis drug for which the State of Wisconsin seeks damages: (a) for its own expenditures under its state-administered medical assistance programs; (b) for copayments paid by Medicare Part B beneficiaries in Wisconsin; and/or (c) for expenditures made by third party payors.

### **INSTRUCTIONS**

Defendant Aventis hereby incorporates the General Instructions outlined in Defendants’ Second Set of Document Requests Directed to Plaintiff.

### **REQUEST FOR PRODUCTION OF DOCUMENTS**

**REQUEST NO. 1:** All documents referred to or used in responding to Aventis’s First Set of Interrogatories.

**REQUEST NO. 2:** For each Subject Drug, by NDC, for which the State seeks damages, provide reimbursement data on a transactional level by each Medical Assistance Program. The data should be produced in an electronic format, by Medical Assistance Program, according to the categories/fields set forth by way of example in Appendix A for pharmacy-dispensed drugs and Appendix B for physician-administered drugs.

**REQUEST NO. 3:** All documents “secured by litigants in recent discovery” relating to Aventis that were referenced in the First Amended Complaint.

**REQUEST NO. 4:** All documents relating to supplemental rebates paid by Aventis for relating to the Subject Drugs under each Medical Assistance Program, including but not limited to contracts between the State and Aventis for supplemental rebates.

REQUEST NO. 5: Meeting minutes, notes, or other summaries from meetings involving the Legislative Fiscal Bureau and/or Joint Committee on Finance regarding reimbursement rates under the Medical Assistance Programs.

REQUEST NO. 6: All budget proposals, options, or other budget analysis relating to reimbursement rates under the Medical Assistance Programs.

Dated this 11<sup>th</sup> day of May, 2006.

**AVENTIS PHARMACEUTICALS INC.**

By: \_\_\_\_\_ /s/

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