

3. "Describe" means to describe fully by reference to underlying facts rather than by ultimate facts or conclusions of facts or law and to particularize as to time, place and manner
4. "Identify" when used in reference to a document, means to provide, to the extent know, information about (i) the type of document; (ii) its general subject matter; (iii) the date of the document; (iv) its author(s); and (v) each addressee.
5. "Identify" when use in reference to a person, means to provide, to the extent known, (i) the person or entity's full name; (ii) present or last known address; (iii) phone number; and when referring to a natural person, (iv) the present or last known place of employment.
6. "Person" means any natural person or any business, legal, or governmental entity or association.
7. "And" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the request any information that might otherwise be construed to be outside its scope.
8. "Comprise" means referring to, describing, evidencing, or constituting.
9. "Refer" and "relate" means in any way consisting of or containing, showing, evidencing, relating or referring in any way, directly or indirectly, to, and is meant to include, among other documents, documents underlying, characterizing, supporting, now or previously attached or appended to, or used in the preparation of any document called for by each request
10. "Document" means the original and each non-identical copy of a document in any medium, including electronic form, whether or not it was communicated to any person other than the author, including but not limited to, writings, printouts, printings, photo-graphs, photocopies, tapes, recordings, video recordings, electronic data, e-mails, and any other symbolic representations in your possession, custody, or control or known or believed by you to exist.

11. "Defendants" means the Defendants identified in the First Amended Complaint that have entered unqualified appearances in this action.

INSTRUCTIONS

1. Unless otherwise specifically stated, the requests below refer to the time period of January 1, 1993 to the present.

2. Each request for production of documents extends to all documents in your possession, custody, or control or anyone acting on your behalf. A document is to be deemed in your possession, custody, or control if it is in your physical custody, or if it is in the physical custody of any other person and you (a) own such document in whole or in part; (b) have a right, by contract, statute, or otherwise, to use, inspect, examine, or copy such document on any terms; (c) have an understanding, express or implied, that you may use, inspect, examine or copy such document on any terms; or (d) have, as a practical matter, been able to use, inspect, examine, or copy such document when you sought to do so.

3. If production is requested of a document that is no longer in your possession, custody, or control, your response should state when the document was most recently in your possession, custody, or control, how the document was disposed of, and the identity of the person, if any, presently in possession, custody, or control of such document. If the document has been destroyed, state the reason for its destruction.

4. Provide the following information for each document withheld on the grounds of privilege:

- (a) its date;
- (b) its title;
- (c) its author;
- (d) its address;
- (e) the specific privilege under which it is withheld;

- (f) its general subject matter; and
- (g) a description of it that you contend is adequate to support your

contention that it is privileged.

5. Pursuant to the Wisconsin Rules of Civil Procedure, these requests for documents are continuing in nature so as to require, whenever necessary, continuing production and supplementation of responses between the initial date for production set forth above and the end of trial.

6. To the extent that you consider any of the following requests for production of documents objectionable, please respond to the remainder of the production request, and separately state the part of each request to which you object and each ground for each objection.

INTERROGATORY

INTERROGATORY NO. 1:

With respect to your representation in the Status Report that you have "evidence that the manufacturers caused phony and inflated wholesale prices to be published with respect to each of the listed drugs," on the list of drugs attached to the Status Report (attached hereto as Exhibit A):

- (a) Describe such evidence with respect to each defendant and each drug; and
- (b) Identify all persons with knowledge of such evidence with respect to each defendant and each drug.

REQUEST FOR PRODUCTION OF DOCUMENTS

REQUEST NO. 1:

All documents relied upon in connection with your response to Interrogatory No. 1 or that otherwise comprise, refer or relate to your evidence that each defendant "caused phony and inflated wholesale prices to be published with respect to each of the listed drugs" set forth on the list of drugs attached to the Status Report (attached hereto as Exhibit A).

Dated this 19th day of October, 2005.

By:



Beth Kushner SBN 1008591
Timothy Feeley SBN 1018204
VON BRIESEN & ROPER, S.C.
411 East Wisconsin Avenue, Suite 700
Milwaukee, WI 53202
Tele: (414) 287-1373
Fax: (414)276-6281

John C. Dodds
Kimberly K. Heuer
MORGAN, LEWIS & BOCKIUS, LLP
1701 Market Street
Philadelphia, PA 19103
Tele: (215) 963-5000
Fax: (215)963-5001

Scott A. Stempel
MORGAN, LEWIS & BOCKIUS, LLP
1111 Pennsylvania Avenue, NW
Washington, D.C. 20004
Tele: (202) 739-3000
Fax: (202) 739-3001

*Attorneys for Pfizer Inc. and Pharmacia
Corporation and Serving on Behalf of all
Defendants*