

As to all matters referred to in these responses and objections to the Requests, Roxane's investigation and discovery continue. The specific responses set forth below, and any production made consistent with the accompanying Requests, are based upon, and necessarily limited by, information now available to Roxane. Roxane reserves the right to modify or supplement these responses and objections, and to raise any additional objections deemed necessary and appropriate in light of the results of any further review.

SPECIFIC RESPONSES AND OBJECTIONS TO REQUESTS

REQUEST NO. 23: Attached hereto as Exh. 1 is a copy of a blank form entitled "HDMA Standard Product Information Pharmaceutical Products." Please produce all such forms that you have completed (as to any or all of the information on such forms) for any of your drugs from January 1, 1991 to the present as well as all documents that identify each person or entity, if any (including but not limited to Cardinal Health, McKesson Corporation, or Amerisource Bergen Corporation, or any of their predecessor entities), to whom you sent or provided any such forms and the dates that you sent or provided such forms to any such person or entity.

RESPONSE: In addition to the General Objections set forth below, Roxane objects to Request No. 23 on the grounds that it calls for the production of "all" documents when relevant information can be obtained from fewer than "all" documents. Roxane also objects on the grounds that the term "completed" is vague, ambiguous, and undefined. Roxane further objects to this Request to the extent it seeks documents relating to drugs other than those identified in the Stipulation Regarding the Identity of the Proper Defendant and Target Drugs Between the State of Wisconsin and Defendants Roxane Laboratories, Inc. and Boehringer Ingelheim Roxane, Inc. filed on April 22, 2008 ("Roxane Drug List"), and documents created outside the relevant time frame of this case.

Subject to and without waiving its general and specific objections, Roxane states that it will make available for inspection and/or copying HDMA Standard Product Information Pharmaceutical Products forms and non-privileged documents reflecting the persons or entities

to which, or the dates on which, Roxane provided any such forms, to the extent such documents exist, for the drugs identified in the Roxane Drug List.

REQUEST NO. 24: Any documents reflecting communications with drug wholesalers (including but not limited to Cardinal Health, McKesson Corporation, or Amerisource Bergen Corporation, or any of their predecessor entities) relating to: (a) AWP, SWP, WAC, MAC, FUL, or direct price; or (b) any pricing compendia including but not limited to First DataBank, Medispan, and Red Book.

RESPONSE: Subject to and without waiving its general objections, Roxane states that it will make available for inspection and/or copying non-privileged documents reflecting Roxane's communications with drug wholesalers relating to (a) the meaning or understanding of "AWP, SWP, WAC, MAC, FUL, or direct price" or (b) the pricing compendia, to the extent such documents exist.

REQUEST NO. 25: Documents relating to any contract or agreement with any health-care provider (including but not limited to retail pharmacies (chain or independent), doctors, or long-term care facilities) to share in the profits earned by such provider in connection with the provider's sale or dispensing of any of your prescription drugs.

RESPONSE: In addition to the General Objections set forth below, Roxane objects to Request No. 25 to the extent it seeks documents relating to drugs other than those identified in the Roxane Drug List, and documents created outside the relevant time frame of this case.

Subject to and without waiving its general and specific objections, Roxane states that it does not have contracts or agreements with health-care providers to share in the profits earned by such providers, and therefore does not have documents responsive to Request No. 25.

GENERAL OBJECTIONS

Roxane incorporates by reference all of its general objections enumerated in Roxane Laboratories, Inc. and Boehringer Ingelheim Roxane, Inc.'s Responses and Objections to Plaintiff's Fifth Set of Requests for Production of Documents, served on Plaintiff July 27, 2007, as part of its response to each request set forth above.

Date: August 21, 2008

Respectfully submitted,

/s/ Colin M. Seals

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CERTIFICATE OF SERVICE

I, Colin M. Seals, hereby certify that on August 21, 2008 a true and correct copy of the foregoing ROXANE LABORATORIES, INC. AND BOEHRINGER INGELHEIM ROXANE, INC.'S RESPONSES AND OBJECTIONS TO PLAINTIFF'S EIGHTH SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS was served on all counsel of record via Lexis Nexis File & Serve®.

/s/ Colin M. Seals

Colin M. Seals