

3. AstraZeneca's answer is made based upon reasonable and diligent investigation conducted to date. Discovery and investigation in this matter are ongoing and AstraZeneca reserves the right to amend its answer and to raise any additional objections it may have in the future and to a demand for further response. This answer was made based upon the typical or usual interpretation of words contained in the Interrogatory, unless a specific definition or instruction has been provided and/or agreed upon.

4. AstraZeneca's answer to the Interrogatory contains information subject to the Protective Order in this matter and must be treated accordingly.

5. AstraZeneca's answer to the Interrogatory is submitted without prejudice to AstraZeneca's right to produce evidence of any subsequently discovered fact. AstraZeneca accordingly reserves its right to provide further objections and answers as additional facts are ascertained.

GENERAL OBJECTIONS

AstraZeneca makes the following General Objections:

1. AstraZeneca objects to Plaintiff's "Definitions" to the extent Plaintiff intends to expand upon or alter AstraZeneca's obligations under Wisconsin statutes in responding to the Interrogatory. AstraZeneca will comply with Wisconsin statutes in providing its answers to the Interrogatory.

2. AstraZeneca objects to the Interrogatory to the extent it is vague and ambiguous, unduly burdensome, overly broad, oppressive or duplicative, or seeks information that is neither relevant to the issues presented in this case nor reasonably calculated to lead to the discovery of admissible evidence.

3. AstraZeneca objects to the Interrogatory to the extent it seeks information that is protected from disclosure by the work product doctrine, the attorney-client, accountant-client, consulting expert, investigative privileges, any common interest or joint defense privilege or agreement, or any other applicable privilege or protection.

4. AstraZeneca objects to the Interrogatory to the extent it calls for information not within AstraZeneca's possession, custody or control. In responding to the Interrogatory, AstraZeneca has undertaken or will undertake a reasonably diligent and reasonable search of documents and information within AstraZeneca's current possession, custody or control.

5. AstraZeneca objects to the Interrogatory to the extent it calls for information that is confidential, proprietary, and/or a trade secret of a third party or is protected from disclosure by an agreement with a third-party.

6. AstraZeneca objects to the Interrogatory to the extent it seeks disclosure of information that is a matter of public record, is equally available to the Plaintiff, or is already in the possession of the Plaintiff.

7. AstraZeneca objects to the Interrogatory to the extent that it seeks to impose discovery obligations that are broader than, or inconsistent with, its obligations under Wisconsin rules or statutes.

8. AstraZeneca objects to any implications and to any explicit or implicit characterization of facts, events, circumstances, or issues in the Interrogatory. AstraZeneca's willingness to respond to the Interrogatory is not intended to mean that AstraZeneca agrees with any implications or any explicit or implicit characterization of facts, events, circumstances, or issues in the Interrogatory or that it is relevant to this action.

9. No objection made herein, or lack thereof, shall be deemed an admission by AstraZeneca as to the existence or nonexistence of any information.

10. The information supplied herein is for use in this litigation and for no other purpose, and is supplied subject to that express limitation.

ANSWER AND OBJECTIONS TO THE INTERROGATORY

INTERROGATORY NO. 12:

With respect to the facts which you identify in response to Interrogatories No. 6 and No. 8 identify each person having knowledge of each of these facts and identify which fact each person has knowledge of, and state the present business title, business address and home address of each such person.

ANSWER: AstraZeneca incorporates by reference herein its objections and responses to Interrogatories Nos. 6 and 8, as well as its General Objections. Notwithstanding AstraZeneca's general and specific objections, and without waiving them, AstraZeneca states that the following groups of people may have knowledge regarding the facts identified by AstraZeneca in response to Interrogatories Nos. 6 and 8:

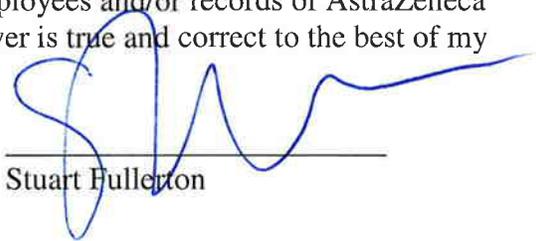
1. Current and former employees of the State of Wisconsin who had responsibility for administering the State's Medicaid Program. These employees may have knowledge regarding the State's Medicaid coverage decisions and the State's payment and reimbursement for the drugs at issue in this litigation (the "Targeted Drugs"), including rebates received for such drugs from AstraZeneca. These individuals should also have knowledge that AWP was never understood to represent an actual average of wholesale prices.
2. Current and former employees of the federal government including, but not limited to, employees of the Department of Health and Human Services ("HHS"), the Centers for Medicare and Medicaid Services (formerly the Health Care Finance Administration), the General Accounting Office, and the HHS Office of Inspector General. Such persons have knowledge regarding Medicaid coverage and rebates. These individuals should also have knowledge that AWP was never understood to represent an actual average of wholesale prices.

3. Current and former third-party advisors and/or consultants to the State. These individuals may have knowledge regarding the State's Medicaid plan design, coverage decisions, and payments made by the State for the Targeted Drugs. These individuals should also have knowledge that AWP was never understood to represent an actual average of wholesale prices.
4. Health care providers who prescribe and/or administer the Targeted Drugs. Such persons may have knowledge regarding the purchase, coverage, and payment for the Targeted Drugs.
5. Individuals employed by pharmacies that purchase and/or dispense the Targeted Drugs. Such persons may have knowledge regarding the purchase, coverage, and payment for the Targeted Drugs.
6. Pharmacy benefit managers. Such intermediaries may have knowledge regarding the purchase, coverage, and payment for the Targeted Drugs. These individuals should also have knowledge that AWP was never understood to represent an actual average of wholesale prices.
7. Pharmaceutical wholesalers. Such intermediaries may have knowledge regarding the purchase, coverage, and payment for the Targeted Drugs. These individuals should also have knowledge that AWP was never understood to represent an actual average of wholesale prices.
8. Current and former employees of Defendant AstraZeneca, including but not limited to:
 - current and former members of the AstraZeneca Managed Markets Government Operations and Government Pricing groups. Such persons have knowledge regarding AstraZeneca's communications with State Medicaid agencies, including but not limited to the transmittal of ASP pricing to such agencies, and of knowledge by State Medicaid agencies of the difference between AWP and the actual cost paid by healthcare providers and pharmacies for the Targeted Drugs;
 - current and former members of the Pricing Strategy Group. Such persons may have knowledge regarding the factors taken into consideration by AstraZeneca when determining launch prices and subsequent pricing adjustments for each of the Targeted Drugs;
 - current and former members of the AstraZeneca Federal Government Affairs Group. Such individuals have knowledge regarding the awareness among governmental entities, including State Medicaid agencies, of the difference between AWP and the actual cost paid by healthcare providers and pharmacies for the Targeted Drugs.

Because discovery and the process of investigating issues relevant to the claims and defenses in this matter is ongoing, there may well be additional persons or categories of people who will be identified as possessing information responsive to Interrogatories Nos. 6 and 8. Likewise, the people identified above may possess additional or different knowledge and information, depending on a variety of circumstances.

VERIFICATION

I, Stuart Fullerton, am the Senior Litigation Counsel for AstraZeneca Pharmaceuticals LP. I have been authorized by AstraZeneca Pharmaceuticals LP and AstraZeneca LP to provide this verification on their behalf. I have reviewed the above Answer and Objections to Plaintiff's Fourth Set of Interrogatories to All Defendants, which was prepared in reliance on information from officers, agents, employees and/or records of AstraZeneca Pharmaceuticals LP and AstraZeneca LP. The answer is true and correct to the best of my knowledge, information and belief.



Stuart Fullerton

Subscribed and sworn to before me
this 4th day of March, 2007.



Notary Public, State of Delaware

My Commission Expires:

PAULETTE L. HENDRIX
NOTARY PUBLIC
STATE OF DELAWARE
My Commission Expires March 10, 2010

March 19, 2007

As to Objections,

By:



Brian E. Butler
Barbara A. Neider
STAFFORD ROSENBAUM LLP
222 West Washington Avenue, Suite 900
Post Office Box 1784
Madison, Wisconsin 53701-1784
Tel.: 608-256-0226

OF COUNSEL

D. Scott Wise

Michael S. Flynn

Kimberley D. Harris

Kristi T. Prinzo

DAVIS POLK & WARDWELL

450 Lexington Avenue

New York, NY 10017

Tel.: 212-450-4000

Fax: 212-450-3800

Attorneys for Defendants AstraZeneca Pharmaceuticals
LP and AstraZeneca LP