
STATE OF WISCONSIN,)	
)	
Plaintiff,)	Case No.: 04-CV-1709
)	
v.)	
)	
AMGEN INC., et al.,)	
)	
Defendants.)	

**ASTRAZENECA PHARMACEUTICALS LP AND ASTRAZENECA LP's ANSWERS
AND OBJECTIONS TO PLAINTIFF'S FIFTH SET OF INTERROGATORIES TO ALL
DEFENDANTS**

Pursuant to Wis. Stat. §§ 804.08 and 804.09, defendants AstraZeneca Pharmaceuticals LP and AstraZeneca LP (collectively "AstraZeneca"), by its attorneys, answers and objects to Plaintiff's Fifth Set of Interrogatories to All Defendants ("the Requests") as follows:

PRELIMINARY STATEMENT

1. AstraZeneca's answers and objections are made solely for the purposes of this action. AstraZeneca's answers are subject to all objections as to competence, relevance, materiality, propriety, and admissibility, and to any and all other objections on any grounds that would require the exclusion of any statements contained herein if such Interrogatory were asked of, or statements contained herein were made by, a witness present and testifying in Court, all of which objections and grounds are expressly reserved and may be interposed at the time of trial.

2. AstraZeneca's answers shall not be deemed to constitute an admission:
- a. that any particular document or thing exists, is relevant, non-privileged, or admissible in evidence; or
 - b. that any statement or characterization in the Requests is accurate or complete.

3. AstraZeneca's answers are 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 answers and to raise any additional objections it may have in the future and to a demand for further response. These answers were made based upon the typical or usual interpretation of words contained in the Requests, unless a specific definition or instruction has been provided and/or agreed upon.

4. AstraZeneca's answers to the Requests contain information subject to the Protective Order in this matter and must be treated accordingly.

5. AstraZeneca's answers to the Requests are 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, which apply to each and every one of the Requests and are therefore not repeated but are incorporated by reference in each and every specific response below:

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 Requests. AstraZeneca will comply with Wisconsin statutes in providing its answers to the Requests.

2. AstraZeneca objects to the definition of the word "Document(s)" on the grounds that it is vague and ambiguous and to the extent that it seeks to impose obligations beyond those imposed by the applicable Wisconsin statutes. AstraZeneca further objects to this definition to

the extent that it purports to require AstraZeneca to identify or produce documents or data in a particular form or format, to convert documents or data into a particular file format, to produce documents or data on any particular media, to search for and/or produce or identify documents or data on backup tapes, to produce any proprietary software, data, programs or databases, to violate any licensing agreement or copyright laws, or to produce data, fields, records, or reports about produced documents or data. The production of any documents or data or the provision of other information by AstraZeneca as an accommodation to Plaintiff shall not be deemed to constitute a waiver of this objection.

3. AstraZeneca objects to the Requests to the extent they are vague and ambiguous, unduly burdensome, overly broad, oppressive, duplicative, or seek documents that are neither relevant to the issues presented in this case nor reasonably calculated to lead to the discovery of admissible evidence.

4. AstraZeneca objects to the Requests to the extent they seek 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.

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

6. AstraZeneca objects to the Requests to the extent they call 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.

7. AstraZeneca objects to the Requests to the extent they seek 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.

8. AstraZeneca objects to the Requests to the extent that they seek to impose discovery obligations that are broader than, or inconsistent with, its obligations under Wisconsin statutes.

9. AstraZeneca objects to the Requests on the ground that they are not limited to the drugs at issue in this case. Any response to the Requests will be limited to the drugs at issue in this case, as reflected in Exhibit A attached to the May 20, 2005 letter from Robert S. Libman to Kristi T. Prinzo.

10. AstraZeneca objects to the Requests on the ground that the specified time period is overly broad and unduly burdensome. Any response to the Requests will be limited to the time period covered by the relevant statutes of limitations and up through June 3, 2004.

11. AstraZeneca objects to any implications and to any explicit or implicit characterization of facts, events, circumstances, or issues in the Requests. AstraZeneca's willingness to respond to any particular Interrogatory Request 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 Requests or that they are relevant to this action.

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

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

ANSWERS AND OBJECTIONS TO INTERROGATORIES

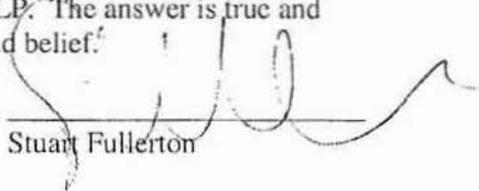
INTERROGATORY NO. 13 For each calendar year from 1993 to the present, identify the following:

- (a) the gross national sales of your drugs in the United States; and
- (b) the percentage of the gross annual sales of your drugs in the United States that is attributable to Medicaid patients, *i.e.*, that results from sales to (or stated differently, reimbursement by) state Medicaid programs.

ANSWER: AstraZeneca objects to Interrogatory No. 13 on the grounds that it is overbroad and seeks information not relevant to the subject matter of the pending action or reasonably calculated to lead to the discovery of admissible evidence. AstraZeneca specifically objects to the State's request for information unrelated to the State of Wisconsin. AstraZeneca further objects to the State's request for information regarding AstraZeneca drugs that are not at issue in this litigation. AstraZeneca also objects to Interrogatory No. 13 to the extent it requests data that is publicly available or already within the State's possession or control. Notwithstanding AstraZeneca's general and specific objections, and without waiving them, AstraZeneca refers the State to the transactional data that AstraZeneca has already produced or agreed to produce which provides information sought by Interrogatory No. 13(a) for the drugs at issue. In response to Interrogatory No. 13(b) AstraZeneca refers the State to its own Medicaid utilization data for the drugs at issue in this litigation.

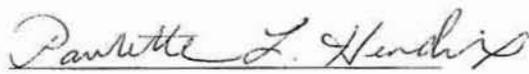
VERIFICATION

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 Interrogatories, which were 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 7th day of December, 2007.



Notary Public, State of Delaware

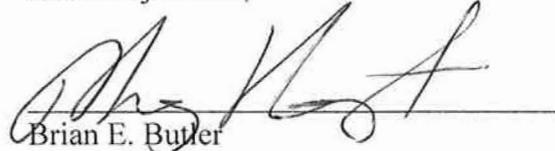
My Commission Expires:



December 10, 2007

As to Objections,

By:



Brian E. Butler



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LP and AstraZeneca LP

CERTIFICATE OF SERVICE

I hereby certify that on December 10, 2007, a true and correct copy of AstraZeneca Pharmaceuticals LP And AstraZeneca LP's Answers And Objections To Plaintiff's Fifth Set Of Interrogatories To All Defendants was served upon all counsel of record via Lexis-Nexis File and Serve.


Meg Vergeront