

STATE OF WISCONSIN,

Plaintiff,

v.

AMGEN INC., et. al.,

Defendants.

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Case No.: 04 CV 1709

DEFENDANTS' THIRD SET OF INTERROGATORIES DIRECTED TO PLAINTIFF

Pursuant to Chapter 804 of the Wisconsin Statutes, Defendants request that the State of Wisconsin ("Plaintiff") respond to the following Interrogatories no later than 30 days from date of service.

DEFINITIONS AND GENERAL INSTRUCTIONS

Defendants hereby incorporate the Definitions and General Instructions contained in Defendants' Second Set of Requests For Production Directed to Plaintiff and Defendants' Second Set of Interrogatories Directed to Plaintiff, both served on February 20, 2006.

INTERROGATORIES

INTERROGATORY NO. 1

Please identify the individuals that Neil Gebhart is referring to when he states that "some here view [this] suit as baseless because it has been generally known for years that 'AWP' does not truly reflect a manufacturer's average wholesaler price" in the document bates-stamped WI-Prod-AWP-112268.

INTERROGATORY NO. 2

For each document identified below, please identify whose files the document was produced from (i.e., the custodian of the document) and who within the Department of Health & Family Services received the document:

- a. WI-Prod-AWP-104235-50.
- b. WI-Prod-AWP-106029-44.
- c. WI-Prod-AWP-106223-97.
- d. WI-Prod-AWP-106081-95.
- e. WI-Prod-AWP-112123-4.
- f. WI-Prod-AWP-104251-68.
- g. WI-Prod-AWP-112312-45.
- h. WI-Prod-AWP-113084-97.
- i. WI-Prod-AWP-106306-28.
- j. WI-Prod-AWP-104215-44.
- k. WI-Prod-AWP-108022-24.

INTERROGATORY NO. 3

Please identify the individual(s) who authored WI-Prod-AWP-106010-18 and WI-Prod-AWP-108880-91.

INTERROGATORY NO. 4

Please identify what State entity (e.g., Legislature, Department of Health & Family Services, etc.) sets, and the process by which it sets, the reimbursement rate for pharmaceutical drugs reimbursed by the State.

INTERROGATORY NO. 5

Please identify each specific program within the State allegedly harmed by defendants' conduct for which you are seeking damages, and separately for each such program:

- (a) describe the basis for your damages claims,
- (b) identify the defendants and drugs and time periods for which the damages claims for that program apply, and

(c) identify the persons with knowledge of that program's damages.

May 21, 2007

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Attorneys for Amgen Inc.

CERTIFICATE OF SERVICE

I hereby certify that on May 21, 2007, a true and correct copy of the foregoing was served upon all counsel of record via electronic service pursuant to Case Management Order No. 1 by causing a copy to be sent to LexisNexis File & Serve for posting and notification.

/s/ Jennifer A. Walker
Jennifer A. Walker