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

**THE JOHNSON & JOHNSON DEFENDANTS’ SUPPLEMENTAL
RESPONSES AND OBJECTIONS TO PLAINTIFF’S FOURTH SET OF
INTERROGATORIES TO ALL DEFENDANTS**

Pursuant to Wisconsin Rule of Civil Procedure 804.08, Johnson & Johnson, Janssen, L.P., McNeil-PPC, Inc., Ortho Biotech Products., L.P., and Ortho-McNeil Pharmaceutical, Inc. (the “J&J Defendants”), by their attorneys, hereby supplement their objections and responses to Plaintiff’s Fourth Set of Interrogatories to All Defendants (“Plaintiff’s Interrogatory”) as follows:

PRELIMINARY STATEMENT

The J&J Defendants repeat and incorporate their previous responses and objections as if fully set forth herein. Notwithstanding their objections, the J&J Defendants supplement their previous responses and objections as follows:

ANSWERS AND OBJECTIONS TO INTERROGATORIES

INTERROGATORY NO. 12:

With respect to the facts which you identify in response to interrogatories No. 6 and No. 8 (attached) 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: The J&J Defendants incorporate by reference herein their objections and responses to Interrogatories Nos. 6 and 8. The J&J Defendants further object to Interrogatory No. 12 on the grounds that it is overly broad and unduly burdensome and to the extent it seeks information protected by the attorney-client privilege and work-product doctrine. The J&J Defendants also object to this Interrogatory because the J&J Defendants have not yet fully identified all individuals who may have knowledge of all of the facts that support the J&J Defendants' denials and Affirmative Defenses since discovery and investigation remain ongoing.

Notwithstanding the J&J Defendants' general and specific objections, and without waiving them, the J&J Defendants answer that, based upon diligent review and investigation to date, the following persons, among others, may have knowledge generally supporting the J&J Defendants' denials to the allegations of Plaintiff's Second Amended Complaint and supporting the J&J Defendants' affirmative defenses to Plaintiff's Second Amended Complaint:

Name and Former or Current Position	Subject(s) of Information
Cathy Dooley Johnson & Johnson <i>To be contracted through undersigned counsel.</i>	Marketing, sales, contracting, pricing, reporting of pricing, communications with the government and reimbursement – Ortho Biotech Products, L.P.
Thomas Hiriak Ortho Biotech Products, L.P. <i>To be contracted through undersigned counsel.</i>	Marketing, sales, contracting, pricing, reporting of pricing, and reimbursement – Ortho Biotech Products, L.P.
William Pearson Ortho Biotech Products, L.P. <i>To be contracted through undersigned counsel.</i>	Marketing, sales, contracting, pricing, reporting of pricing, and reimbursement – Ortho Biotech Products, L.P.

Name and Former or Current Position	Subject(s) of Information
<p>Kathleen Buto Johnson & Johnson</p> <p><i>To be contracted through undersigned counsel.</i></p>	<p>Discussions with CMS regarding reported benchmark prices and reimbursement.</p>
<p>Gregory T. Aronin Johnson & Johnson</p> <p><i>To be contracted through undersigned counsel.</i></p>	<p>Communications with the government related to J&J Defendants' products.</p>
<p>William Baxter Johnson & Johnson Health Care Systems</p> <p><i>To be contracted through undersigned counsel.</i></p>	<p>Medicaid rebates for J&J Defendants' products and related calculations.</p>
<p>Bruce Colligen Janssen L.P.</p> <p><i>To be contracted through undersigned counsel.</i></p>	<p>Discussions with CMS regarding reported benchmark prices and reimbursement.</p>
<p>Christine Poon Johnson & Johnson</p> <p><i>To be contracted through undersigned counsel.</i></p>	<p>The role of Johnson & Johnson in relation to its operating companies.</p>
<p>Gary Reedy Ortho Biotech Products, L.P.</p> <p><i>To be contracted through undersigned counsel.</i></p>	<p>Marketing, sales, contracting, pricing, reporting of pricing, and reimbursement – Ortho Biotech Products, L.P.</p>
<p>Ellen MacDonald Ortho Biotech Products, L.P.</p> <p><i>To be contracted through undersigned counsel.</i></p>	<p>Marketing and sales – Ortho Biotech Products</p>
<p>Carole Webb Ortho Biotech Products, L.P.</p> <p><i>To be contracted through undersigned counsel.</i></p>	<p>Marketing, sales, contracting, pricing, reporting of pricing, and reimbursement – Ortho Biotech Products, L.P.</p>

Name and Former or Current Position	Subject(s) of Information
Thomas Amick Ortho Biotech Products, L.P. <i>To be contracted through undersigned counsel.</i>	Marketing, sales, contracting, pricing, reporting of pricing, and reimbursement – Ortho Biotech Products, L.P.
Elaine Kling Ortho Biotech Products, L.P. <i>To be contracted through undersigned counsel.</i>	Contracting, reporting of pricing – Ortho Biotech Products, L.P.
John Dempsey Ortho Biotech Products, L.P. <i>To be contracted through undersigned counsel.</i>	Marketing, sales, contracting, pricing, reporting of pricing, and reimbursement – Ortho Biotech Products, L.P.
Jeff Stewart Ortho Biotech Products, L.P. <i>To be contracted through undersigned counsel.</i>	Marketing, sales, contracting, pricing, reporting of pricing, and reimbursement – Ortho Biotech Products, L.P.
Dick Robbins Ortho Biotech Products, L.P. <i>To be contracted through undersigned counsel.</i>	Marketing and sales – Ortho Biotech Products, L.P.
Dwayne Marlowe Ortho Biotech Products, L.P. <i>To be contracted through undersigned counsel.</i>	Marketing, sales and reimbursement – Ortho Biotech Products, L.P.
Timothy Uhron Ortho Biotech Products, L.P. <i>To be contracted through undersigned counsel.</i>	Marketing and sales – Ortho Biotech Products, L.P.
Craig Phillips Ortho Biotech Products, L.P. <i>To be contracted through undersigned counsel.</i>	Marketing and sales – Ortho Biotech Products, L.P.

Name and Former or Current Position	Subject(s) of Information
<p>Susan Lane-Stone Ortho Biotech Products, L.P.</p> <p><i>To be contracted through undersigned counsel.</i></p>	<p>Contracting and reimbursement – Ortho Biotech Products, L.P.</p>
<p>John Hess Ortho Biotech Products, L.P.</p> <p><i>To be contracted through undersigned counsel.</i></p>	<p>Marketing and sales – Ortho Biotech Products, L.P.</p>
<p>Maria Sevell Ortho Biotech Products, L.P.</p> <p><i>To be contracted through undersigned counsel.</i></p>	<p>Sales training, marketing and sales – Ortho Biotech Products, L.P.</p>
<p>Robert Spurr Ortho-McNeil Pharmaceutical, Inc.</p> <p><i>To be contracted through undersigned counsel.</i></p>	<p>Marketing, sales, contracting, pricing, reporting of pricing, and reimbursement – Ortho-McNeil Pharmaceutical, Inc.</p>
<p>William Parks Janssen L.P.</p> <p><i>To be contracted through undersigned counsel.</i></p>	<p>Marketing, sales, contracting, pricing, reporting of pricing, and reimbursement – Janssen L.P.</p>
<p>Lydia Bejma Janssen L.P.</p> <p><i>To be contracted through undersigned counsel.</i></p>	<p>Together RX</p>
<p>Kurt Barry Janssen L.P.</p> <p><i>To be contracted through undersigned counsel.</i></p>	<p>Marketing, sales, contracting, pricing, reporting of pricing, and reimbursement – Janssen L.P.</p>
<p>Diane Ortiz Johnson & Johnson</p> <p><i>To be contracted through undersigned counsel.</i></p>	<p>Reimbursement for the J&J Defendants’ products.</p>

Name and Former or Current Position	Subject(s) of Information
Christopher Maffie Johnson & Johnson Health Care Systems <i>To be contracted through undersigned counsel.</i>	Contracting for the J&J Defendants' products.
Lennox Taulbee Johnson & Johnson Health Care Systems <i>To be contracted through undersigned counsel.</i>	Contracting for the J&J Defendants' products.
Rock Magnotta McNeil Consumer & Specialty <i>To be contracted through undersigned counsel.</i>	Marketing, sales, pricing – McNeil-PPC, Inc.

The J&J Defendants do not disclose herein the names of inside or outside counsel whose knowledge of relevant facts and circumstances relates only to their activities in providing legal advice and therefore is protected by the attorney-client privilege. Current and former the J&J Defendants employees, including those listed above, should be contacted exclusively through counsel for the J&J Defendants:

William F. Cavanaugh
 Patterson Belknap Webb & Tyler LLP
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and/or

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The J&J Defendants further state that current and former employees, representatives, and/or officials of the following entities are likely to have discoverable information in this case: branches, agencies, and departments of the Wisconsin state government, including, but not limited to, the Wisconsin Department of Health and Family Services; branches, agencies, and departments of the federal government, including, but not limited to, the Department of Health and Human Services (“HHS”), the Office of the Inspector General (“OIG”), and the Centers for Medicare and Medicaid Services (“CMS”), f/k/a Health Care Financing Administration (“HCFA”); independent pricing compendia publishers, including, but not limited to, First DataBank; wholesalers for pharmaceutical products, including, but not limited to, AmerisourceBergen; and agents of the State of Wisconsin for Medicaid claims processing. The identities of the individuals referenced above are best known to the State and should be listed in the State’s Rule 26 disclosures and identified in the State’s discovery responses. Notwithstanding, the J&J Defendants herein disclose the following current and former employees, representatives, and/or officials of the entities referenced above, who are likely to have discoverable information in this case.

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The J&J Defendants further incorporate by reference all persons identified in the Rule 26 disclosures of the other parties to this action. The J&J Defendants' identification of individuals in this Response shall not be construed as an admission by the J&J Defendants that any information possessed by such individuals is relevant to or admissible in this litigation. This Response is not a waiver of any objections that the J&J Defendants may have. The J&J Defendants expressly reserve the right to supplement this Interrogatory Answer in the future.

October 12, 2007

/s/

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Certificate of Service

I, Mark G. Young, hereby certify that on this 12th day of October 2007, a true and correct copy of the previously served **J&J DEFENDANTS' SUPPLEMENTAL RESPONSES AND OBJECTIONS TO PLAINTIFF'S FOURTH SET OF INTERROGATORIES TO ALL DEFENDANTS** was served on all counsel of record by Lexis Nexis File & Serve®.

/s/

Mark G. Young