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

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**PFIZER INC.’S RESPONSES AND OBJECTIONS TO PLAINTIFF’S  
FOURTH SET OF INTERROGATORIES TO ALL DEFENDANTS**

Pursuant to the Wisconsin Rule of Civil Procedure 804.08, defendant Pfizer Inc. (“Pfizer”), by its attorneys, objects and responds to Plaintiff’s Fourth Set of Interrogatories to All Defendants (“Plaintiff’s Requests”) as follows:

**PRELIMINARY STATEMENT**

1. These responses are made without in any way waiving or intending to waive: (i) any objections as to the competency, relevancy, materiality, privilege, or admissibility as evidence, for any purpose, information or documents produced in response to these Requests; (ii) the right to object on any ground to the use of the documents or information produced in response to the Requests at any hearings or at trial; or (iii) the right to object on any ground at any time for further responses to the Requests; or (iv) its right at any time to revise, correct, add to, supplement, or clarify any of the responses contained herein.

2. Pfizer has not completed its investigation and discovery relating to this case. The specific responses set forth below and any production made pursuant to the accompanying

document requests are based upon, and necessarily limited by, information now available to Pfizer.

3. The information and documents supplied herein are for use in this litigation and for no other purpose.

4. Pfizer objects to these Requests to the extent that they seek documents and information that are neither relevant to the subject matter of the pending action nor reasonably calculated to lead to the discovery of admissible evidence, are overly broad, unduly burdensome, ambiguous and vague.

5. Pfizer objects to these Requests to the extent they call for the production of documents or information protected from disclosure under the attorney-client privilege, the work product doctrine, or any other legally recognized privilege, immunity, or exemption from discovery. To the extent that any such protected documents or information are inadvertently produced in response to these Requests, the production of such documents or information shall not constitute a waiver of Pfizer's right to assert the applicability of any privilege or immunity to the documents or information, and any such documents or information shall be returned to Pfizer's counsel immediately upon discovery thereof.

6. Pfizer objects to these Requests to the extent that they seek documents and information not within Pfizer's possession, custody, or control or are more appropriately sought from third parties to whom requests have been or may be directed.

7. Pfizer objects to these Requests to the extent that they seek production of publicly available documents or information, or that which plaintiff can obtain from other sources.

8. Pfizer's responses to these Requests are submitted without prejudice to Pfizer's right to produce evidence of any subsequently discovered fact. Pfizer accordingly reserves its right to produce further responses and answers as additional facts are ascertained.

9. Pfizer's responses to these Requests contain information subject to the Protective Order in this matter and must be treated accordingly.

10. Pfizer objects to these Requests to the extent that they seek to impose discovery obligations that are broader than, or inconsistent with, Pfizer's obligations under the Wisconsin Rules of Civil Procedure.

11. Pfizer objects to any implications and to any explicit or implicit characterization of facts, events, circumstances, or issues in these Requests. Pfizer's response that it will produce documents in connection with a particular request, or that it has no responsive documents, is not intended to indicate that Pfizer agrees with any implication or any explicit or implicit characterization of facts, events, circumstances, or issues in the Requests or that such implications or characterizations are relevant to this action.

12. Pfizer objects to the definition of the terms "you," "your," and "your company" on the grounds that it is vague, ambiguous and overbroad. The responses herein are made on behalf of Pfizer Inc.

13. Pfizer 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 Rules of Civil Procedure. Pfizer further objects to this definition to the extent that it purports to require Pfizer 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 back-up 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 Pfizer as an accommodation to Plaintiff shall not be deemed to constitute a waiver of this objection.

14. Pfizer expressly incorporates the above General Objections into each specific response to Plaintiff's Requests set forth below as if set forth in full therein. A response to Plaintiff's Requests shall not operate as a waiver of any applicable specific or general objection.

## **RESPONSES AND OBJECTIONS TO INTERROGATORIES**

### **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.

### **RESPONSE TO INTERROGATORY NO. 13:**

Pfizer objects to Interrogatory No. 6 on the grounds that it is overly broad and unduly burdensome. Pfizer further objects to this Interrogatory to the extent it seeks information protected by the work-product doctrine. Pfizer incorporates by reference herein its objections and responses to Interrogatory Nos. 6 and 8. Pfizer also objects to this Interrogatory to the extent it seeks information related to Pfizer's denials that are based in whole or part on the application of applicable laws or legal conclusions.

Subject to and without waiving these objections, Pfizer agrees to produce business records, in a manner to be negotiated and agreed upon between the parties, from which the

answer to Interrogatory No. 12 may be obtained. Pfizer expressly reserves the right to supplement this Interrogatory Response in the future as necessary.

April 12, 2007

/s/ Kimberly K. Heuer

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*Attorneys for Pfizer Inc.*

Certificate of Service

I, Kimberly K. Heuer, hereby certify that on this 12th day of April, 2007, a true and correct copy of PFIZER INC.'S RESPONSES AND OBJECTIONS TO PLAINTIFF'S FOURTH TO ALL DEFENDANTS was served on all counsel of record by Lexis Nexis File & Serve®.

/s/ Kimberly K. Heuer  
Kimberly K. Heuer