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

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**PHARMACIA CORPORATION’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 Pharmacia Corporation (“Pharmacia”), 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. Pharmacia 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 Pharmacia.

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

4. Pharmacia 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. Pharmacia 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 Pharmacia'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 Pharmacia's counsel immediately upon discovery thereof.

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

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

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

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

11. Pharmacia objects to any implications and to any explicit or implicit characterization of facts, events, circumstances, or issues in these Requests. Pharmacia'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 Pharmacia 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. Pharmacia 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 Pharmacia Corporation.

13. Pharmacia 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. Pharmacia further objects to this definition to the extent that it purports to require Pharmacia 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 Pharmacia as an accommodation to Plaintiff shall not be deemed to constitute a waiver of this objection.

14. Pharmacia 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:**

Pharmacia objects to Interrogatory No. 6 on the grounds that it is overly broad and unduly burdensome. Pharmacia further objects to this Interrogatory to the extent it seeks information protected by the work-product doctrine. Pharmacia incorporates by reference herein its objections and responses to Interrogatory Nos. 6 and 8. Pharmacia also objects to this Interrogatory to the extent it seeks information related to Pharmacia'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, Pharmacia directs plaintiff to documents produced in this case, from which the answer to Interrogatory No. 12 may be obtained.

Pharmacia expressly reserves the right to supplement this Interrogatory Response in the future as necessary.

April 12, 2007

/s/ Kimberly K. Heuer

Beth Kushner  
Peter F. Mullaney  
von Briesen & Roper, s.c.  
411 East Wisconsin Ave., Suite 700  
Milwaukee, WI 53202  
Tel: (414) 276-1122  
Fax: (414) 276-6281

John C. Dodds  
Kimberly K. Heuer  
MORGAN, LEWIS & BOCKIUS LLP  
1701 MARKET STREET  
Philadelphia, PA 19103  
Tel: (215) 963-5000  
Fax: (215) 963-5001

Scott A. Stempel  
MORGAN, LEWIS & BOCKIUS LLP  
1111 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004  
Tel: (202) 739-3000  
Fax: (202) 739-3001

*Attorneys for Pharmacia Corporation*

Certificate of Service

I, Kimberly K. Heuer, hereby certify that on this 12th day of April, 2007, a true and correct copy of PHARMACIA CORPORATION'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