

STATE OF WISCONSIN

CIRCUIT COURT
BRANCH 7

DANE COUNTY

STATE OF WISCONSIN,

Plaintiff,

v.

Case No. 04 CV 1709

ABBOTT LABORATORIES, INC., et al,

Defendants.

PLAINTIFF'S RESPONSE TO DEFENDANTS' SIXTH SET OF INTERROGATORIES AND
REQUESTS FOR PRODUCTION DIRECTED TO PLAINTIFF

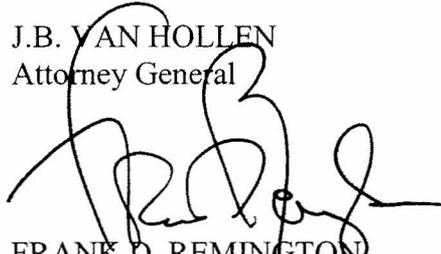
Pursuant to the Wisconsin Rules of Civil Procedure, the State of Wisconsin, by and through its undersigned counsel, respond to “Defendants’ Sixth Set of Interrogatories” as follows.

The Plaintiff objects to Defendants’ definitions numbers four and nine on the ground that they are overbroad and thus unduly burdensome. A substantially similar definition of “you” has already been condemned by this court as overbroad. A similar conclusion is inescapable here. The Plaintiff objects to instruction number five on the ground that it is overbroad and is, despite its rhetoric, somewhat confusing.

On April 1, 2007 Special Discovery Master Eich granted Defendants’ motion to compel in part and accepted the Defendants’ assertion that answers to interrogatories must be signed under oath, not by counsel, but by “a party.” Defendants’ definition of “you” makes that task impossible. Plaintiff’s overture to the Defendants to refine from whom they seek this information have to date been met with no response.

Dated this 2nd day of April 2008.

J.B. VAN HOLLEN
Attorney General

A handwritten signature in black ink, appearing to read 'Frank D. Remington', written over the printed name below.

FRANK D. REMINGTON
Assistant Attorney General
State Bar #1001131

Wisconsin Department of Justice
Post Office Box 7857
Madison, Wisconsin 53707-7857
(608) 266-3542