

STATE OF WISCONSIN,

Plaintiff,

v.

Case No. 04 CV 1709

ABBOTT LABORATORIES, INC., et.al.,

Defendants.

---

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

---

**INTERROGATORY NO. 1**

Did any of Your employees, agents or representatives attend the March 19, 1998 NAMFCU Presentation, or any other NAMFCU meeting at which the March 19, 1998 NAMFCU Presentation was discussed?

**ANSWER TO INTERROGATORY NO. 1**

The Plaintiff OBJECTS to this interrogatory on the ground that it is overbroad. The Plaintiff also OBJECTS on the ground that the interrogatory impermissibly intrudes into confidential matters of prosecutorial discretion and work product. Notwithstanding this objection, there is no record or recollection of anyone attending the above defined "NAMFCU Presentation."

**INTERROGATORY NO. 2**

If the answer to Interrogatory No. 1 is anything other than an unqualified no, identify:

- a. Each of Your employees, agents or representatives who attended the March 19, 1998 NAMFCU Presentation, or any other NAMFCU meeting at which the March 19, 1998 NAMFCU Presentation was discussed; and
- b. Each document You or any of Your employees, agents or representatives received or created in connection with the March 19, 1998 Presentation, or any other NAMFCU meeting at which the March 19, 1998 NAMFCU Presentation was discussed.

**ANSWER TO INTERROGATORY NO. 2**

n/a

**REQUEST NO. 1**

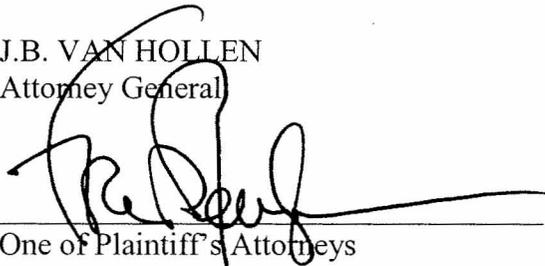
All Documents identified in response to Interrogatory No. 2, above.

**ANSWER TO REQUEST NO. 1**

n/a

Dated this 29th day of April, 2008.

J.B. VAN HOLLEN  
Attorney General



One of Plaintiff's Attorneys  
FRANK D. REMINGTON  
Assistant Attorney General  
State Bar #1001131

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

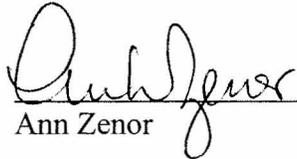
---

VERIFICATION

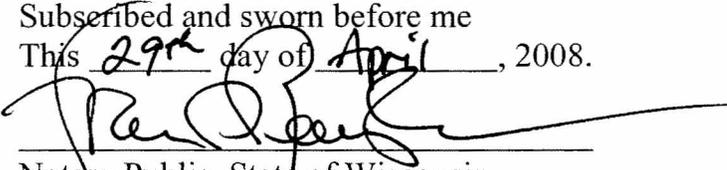
---

I, Ann Zenor hereby state that: I am an Operations Program Associate with the Wisconsin Department of Justice, and in that capacity I execute this Verification. The foregoing response is true and correct to the best of my knowledge, information and belief.

Dated this \_\_\_\_\_ day of April, 2008.

  
Ann Zenor

Subscribed and sworn before me  
This 29<sup>th</sup> day of April, 2008.

  
Notary Public, State of Wisconsin

My commission: in permaent.