



- (d) the person(s) most knowledgeable regarding the determinations;
- (e) the methodology used to determine such prices;
- (f) your purpose(s) in making such determinations;
- (g) whether you disclosed any average sales price or composite price so determined to any publisher, customer, or governmental entity. If so, identify each publisher, customer or governmental entity to whom each such price was disclosed and the corresponding date of the disclosure; and
- (h) whether any such average sales price or composite price was treated as confidential or commercially sensitive financial information.

**Supplemental Response to Interrogatory No. 1:**

Subject to and without waiving the objections set forth above or in Sandoz' Responses & Objections and Supplemental Responses, Sandoz supplements its response to Interrogatory No. 1 as follows:

(g-h) Beginning in 1991 with the inception of the supplemental Medicaid rebate program, Sandoz provided AMP information on a quarterly basis to each state Medicaid agency it paid a rebate to for each NDC for which it paid a rebate to such agency. Sandoz continued this practice until approximately January 1997.

With regard to Wisconsin, this practice began on July 30, 1991, with Sandoz' Medicaid rebate payment for the first quarter of 1991, and continued through and including January 13, 1997, with Sandoz' Medicaid rebate payment for the third quarter of 1996. This information was sent to either the Wisconsin Department of Health and Social Services or EDS at 6406 Bridge Road, Madison, Wisconsin 53784.

DATED: New York, New York, February 13, 2008

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*Attorneys for Defendant Sandoz Inc.*

Certificate of Service

I, Brian L. Bank, hereby certify that on this 13th day of February, 2008, a true and correct copy of the foregoing Defendant Sandoz Inc.'s Second Supplemental Responses to Plaintiff's First Set of Interrogatories to All Defendants was caused to be served all counsel of record by Lexis Nexis File & Serve.

/s/ Brian L. Bank