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

**DEFENDANTS WATSON PHARMACEUTICALS, INC.’S AND
WATSON PHARMA, INC.’S RESPONSES AND OBJECTIONS TO PLAINTIFF’S
FOURTH SET OF INTERROGATORIES TO ALL DEFENDANTS**

Pursuant to Wis. Stat. §§ 804.08 and 804.09, defendants Watson Pharmaceuticals, Inc. and Watson Pharma, Inc. (“Watson”), by and through undersigned counsel, respond and object to Plaintiff’s Fourth Set of Interrogatories to All Defendants (“Plaintiff’s Interrogatory”) as follows:

PRELIMINARY STATEMENT

1. Watson’s answer and objections are made solely for the purposes of this action. Watson’s answer is subject to all objections as to competence, relevance, materiality, propriety, and admissibility, and to any and all other objections on any grounds that would require the exclusion of any statements contained herein if such Interrogatory was asked of, or statements contained herein were made by, a witness present and testifying in Court, all of which objections and grounds are expressly reserved and may be interposed at the time of trial.

2. Watson’s answer shall not be deemed to constitute admission:
- a. that any particular document or thing exists, is relevant, non-privileged, or admissible in evidence; or
 - b. that any statement or characterization in Plaintiff’s Interrogatory is

accurate or complete.

3. Watson's answer is made based upon reasonable and diligent investigation conducted to date. Discovery and investigation in this matter are ongoing and Watson reserves the right to amend its answer and to raise any additional objections it may have in the future. This answer was made based upon the typical or usual interpretation of words contained in Plaintiff's Interrogatory, unless a specific definition or instruction has been provided and/or agreed upon.

4. Watson's answer to Plaintiff's Interrogatory contains information subject to the Protective Order in this matter and must be treated accordingly.

5. Watson's answer to Plaintiff's Interrogatory is submitted without prejudice to Watson's right to produce evidence of any subsequently discovered fact. Watson accordingly reserves its right to provide further objections and answers as additional facts are ascertained.

GENERAL OBJECTIONS

Watson objects generally to Plaintiff's Interrogatory as follows:

1. Watson objects to Plaintiff's "Definitions" to the extent Plaintiff intends to expand upon or alter Watson's obligations under the Wisconsin Rules of Procedure, in responding to Plaintiff's Interrogatory. Watson will comply with Wisconsin Rules of Civil Procedure in providing its answer to Plaintiff's Interrogatory.

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

3. Watson objects to Plaintiff's Interrogatory to the extent it calls for information not relevant to the issues in this action or not reasonably calculated to lead to the discovery of admissible evidence.

4. Watson objects to Plaintiff's Interrogatory to the extent it seeks information that is protected from disclosure by the work product doctrine, the attorney-client, accountant-client, consulting expert, or investigative privileges, any common interest or joint defense agreement, or any other applicable privilege or protection.

5. Watson objects to Plaintiff's Interrogatory to the extent it calls for information not within Watson's possession, custody or control. In responding to Plaintiff's Interrogatory, Watson has undertaken or will undertake a reasonably diligent and reasonable search of documents and information within Watson's current possession, custody or control.

6. Watson objects to Plaintiff's Interrogatory to the extent it calls for information that is confidential, proprietary, and/or a trade secret of a third-party or is protected from disclosure by an agreement with a third-party.

7. Watson objects to Plaintiff's Interrogatory to the extent it seeks disclosure of information that is a matter of public record, is equally available to the Plaintiff, or is already in the possession of the Plaintiff.

8. Watson expressly incorporates the above General Objections in its answer to Plaintiff's Interrogatory set forth below as if set forth in full therein. An answer to Plaintiff's Interrogatory shall not operate as a waiver of any applicable specific or general objection.

RESPONSES AND OBJECTIONS TO INTERROGATORY

INTERROGATORY NO. 12

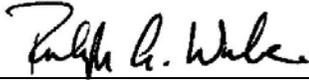
With respect to the facts which you identify in response to interrogatories No. 6 and No. 8 identify each person having knowledge of each of these facts and identify which fact each person has knowledge of, and state the present business title, business address and home address of each such person.

RESPONSE TO INTERROGATORY NO. 12

Watson incorporates by reference herein its objections and responses to Interrogatories Nos. 6 and 8. Watson further objects to Interrogatory No. 12 on the grounds that it is overly broad and unduly burdensome and to the extent it seeks information protected by the attorney-client privilege and work-product doctrine. Watson also objects to this Interrogatory as premature because Watson has not yet fully identified all individuals who may have knowledge of all of the facts that support Watson's denials and Affirmative Defenses since discovery and investigation remain ongoing.

Notwithstanding Watson's general and specific objections, and without waiving them, Watson 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. Watson expressly reserves the right to supplement this Interrogatory Response in the future.

Dated this 13th day of March, 2007.

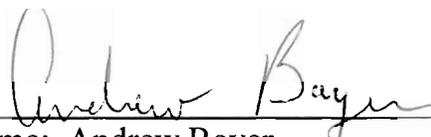
By:  _____

Ralph A. Weber, SBN 1001563
Gass Weber Mullins LLC
309 North Water Street, Suite 700
Milwaukee, WI 53202
Tel: (414) 224-7698
Fax: (414) 224-6116

*Counsel for Defendants Watson
Pharmaceuticals, Inc. and Watson Pharma,
Inc.*

AS TO INTERROGATORY RESPONSES

Andrew Boyer, being duly sworn, deposes and states that he is the Senior Vice President, Sales and Marketing, U.S. Generics Division for Watson Pharma, Inc., and that he verifies **DEFENDANTS WATSON PHARMACEUTICALS, INC.'S AND WATSON PHARMA, INC.'S RESPONSES AND OBJECTIONS TO PLAINTIFF'S FOURTH SET OF INTERROGATORIES TO ALL DEFENDANTS**; that certain of the matters stated therein are not within the personal knowledge of deponent; that the facts therein have been assembled by authorized employees and counsel of Watson Pharma, Inc. and Watson Pharmaceuticals, Inc. ("Watson"); that the responses set forth therein, subject to inadvertent and undiscovered errors, are based upon and therefore necessarily limited by the records and information still in existence, presently recollected, and thus far discovered in the course of preparation of those responses; and, consequently, Watson reserves the right to make any changes in the responses if it appears at any time that omissions or errors have been made therein, or that more accurate information is available; and that subject to the limitations set forth herein, said responses are true to the best of his knowledge, information and belief.


Name: Andrew Boyer

Subscribed and sworn to before me on this 13 day of March, 2007, by
Andrew Boyer

[SEAL]


Notary Public, State of New Jersey
My Commission expires: 2/25/2011

Certificate of Service

I, Ralph A. Weber, hereby certify that on this 13th day of March 2007, a true and correct copy of **DEFENDANTS WATSON PHARMACEUTICALS, INC.'S AND WATSON PHARMA, INC.'S RESPONSES AND OBJECTIONS TO PLAINTIFF'S FOURTH SET OF INTERROGATORIES TO ALL DEFENDANTS** was served on all counsel of record by Lexis Nexis File & Serve®.

A handwritten signature in black ink, appearing to read "Ralph A. Weber", is written over a horizontal line.

Ralph A. Weber