

3. Sandoz objects to plaintiffs' requests to the extent they seek information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

4. Sandoz objects to plaintiffs' requests to the extent that the material sought was relevant, if at all, to matters that have been mooted by subsequent events.

SANDOZ' RESPONSES TO REQUESTS FOR ADMISSIONS

All references hereinbelow to "Sandoz' Answer" are to the Answer of Sandoz Pharmaceuticals Corporation to the Complaint of the District of Columbia, served and filed herein on January 25, 1991.

REQUEST NO. 1: Approximately 1 percent of the population of the United States or 2.4 million people, suffer from schizophrenia.

RESPONSE: See Sandoz' Answer ¶ 11.

REQUEST NO. 2: Approximately 1.7 million schizophrenia patients are hospitalized annually for treatment.

RESPONSE: See Sandoz' Answer ¶ 11.

REQUEST NO. 3: Approximately 25 percent of all beds used for any medical treatment in the United States are used by schizophrenia patients.

RESPONSE: See Sandoz' Answer ¶ 11.

REQUEST NO. 4: Medical costs in the United States for the treatment of schizophrenia are approximately \$40 billion annually.

RESPONSE: See Sandoz' Answer ¶ 12.

REQUEST NO. 5: At least 80 percent of the institutionalized patients identified by Sandoz as suitable candidates for Clozaril treatment are treated at public expense.

RESPONSE: See Sandoz' Answer ¶ 13.

REQUEST NO. 6: The overwhelming majority of in-patients treated for schizophrenia are treated in state funded and operated institutions.

RESPONSE: See Sandoz' Answer ¶ 14.

REQUEST NO. 7: Agranulocytosis and leukopenia have been identified as side effects of other drugs, including standard neuroleptics, penicillin, ibuprofen, and many other commonly used drugs.

RESPONSE: See Sandoz' Answer ¶ 22.

REQUEST NO. 8: Pharmacists monitor for side effects and adverse interactions among drugs.

RESPONSE: See Sandoz' Answer ¶ 24.

REQUEST NO. 9: Even though schizophrenia patients receive a variety of treatments, including treatments with several drugs, CPMS focuses solely on one drug side effect (agranulocytosis) of one drug (Clozaril).

RESPONSE: See general objection 4; see also Sandoz' Answer ¶ 25.

REQUEST NO. 10: Because the services provided under CPMS do not include the monitoring of other potentially fatal side effects or conditions, schizophrenia patients receiving Clozaril must still be monitored by their primary care physicians.

RESPONSE: See general objection 4; denied.

REQUEST NO. 11: Clozapine treatment is vastly superior to treatment with standard neuroleptics for many schizophrenia patients.

RESPONSE: See Sandoz' Answer ¶ 17.

REQUEST NO. 12: Clozapine relieves symptoms of schizophrenia that are not relieved by any other treatment.

RESPONSE: See Sandoz' Answer ¶ 17.

Dated: June 3, 1991

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