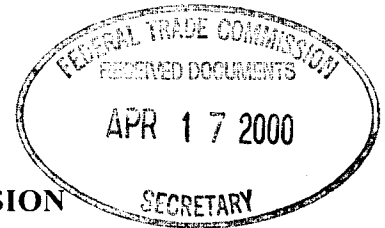


UNITED STATES OF AMERICA
BEFORE FEDERAL TRADE COMMISSION



In the Matter of

HOECHST MARION ROUSSEL, INC.,
a corporation,

CARDERM CAPITAL L.P.,
a limited partnership,

and

ANDRX CORPORATION,
a corporation.

Docket No. 9293

COMPLAINT COUNSEL'S INITIAL DISCLOSURES

Complaint Counsel hereby submits its initial disclosures to respondents Hoechst Marion Roussel, Inc., Carderm Capital, L.P., and Andrx Corporation under § 3.31(b) of the Federal Trade Commission's Rules of Practice for Adjudicative Proceedings. Set forth below are the names, addresses, and telephone numbers of individuals likely to have discoverable information relevant to the allegations asserted in the complaint in this matter to the extent their identities are not privileged. In addition, we hereby provide a description by category and location of documents, data compilations, and tangible things in our possession, custody, or control that are relevant to the allegations of the complaint, the proposed relief or to respondents' defenses, excluding information or material subject to privilege, trial preparation material, material that pertains to experts, and material that is obtainable from some other source that is more convenient, less burdensome, or less expensive.

I. Organizations Likely to Have Discoverable Information

The following organizations are likely to have discoverable information relevant to the allegations in this matter. We have set forth each organization's name, address and telephone number to the extent that the information is known to us. We do not disclose the identity of any non-testifying experts pursuant to the protection from disclosure provided in Rule 3.31(c)(3) and (4). We will disclose the identity of testifying experts, if any, as provided in the Scheduling Order to be entered in this matter. Additionally, we have made no attempt to identify: (a) any present or former officers, directors, employees, agents, investigators or consultants of respondents (or their predecessors); or (b) specific individuals at the United States Food and Drug Administration.

A. Pharmaceutical Companies

1. Abbott Laboratories
100 Abbott Park Road
Abbott Park, IL 60064-6400
(847) 937-6100
2. Apothecon
Bristol Myers Squibb
777 Scudders Mill Rd.
Plainsboro, NJ 08536
(609) 897-2000
3. Astra Zeneca PLC
725 Chesterbrook Boulevard
Wayne, PA 19087-5677
(610) 695-1000

4. Bayer Corp. Pharmaceutical Div.
400 Morgan Lane
West Haven, CT 06516
(203) 937-2000
5. Boehringer Ingelheim
900 Ridgebury Road
P.O. Box 368
Ridgefield, CT 06877
(203) 798-9988
6. Bristol-Myers Squibb
345 Park Avenue
New York, NY 10154
(212) 546-4000
7. Chase Labs
9 E. Chase St.
Baltimore, MD 21202
(410) 539-1488
8. Copley Pharmaceuticals
25 John Rd.
Canton, MA 02021
(781) 821-6111
9. Danbury Pharmaceuticals
Mt. Ebo Corporate Park RR
Brewster, NY 10509
(914) 278-3700
10. Flemington Pharmaceutical Co.
43 Emery Ave.
Flemington, NJ 08822
(908) 782-3431
11. Forest Laboratories
909 Third Avenue
New York, NY 10022
(212) 421-7850

12. Geneva Pharmaceuticals
2555 W. Midway Blvd.
Broomfield, CO 80020
(303) 466- 2400
13. Glaxo-Wellcome
Five Moore Drive
Box 13408
Research Triangle Park, NC 27709
(919) 248-2100
14. Knoll Pharmaceutical Co.
3000 Continental Drive North
Mount Olive, NJ 07828
(973) 426-2600
15. Lederle Laboratories
401 Middletown Rd.
Pearl River, NY 10965
(914) 732-5000
16. Merck & Co.
One Merck Drive
P.O. Box 100
Whitehouse Station, NJ 08889-0100
(908) 423-1000
17. Mutual Pharmaceuticals
1100 Orthodox St.
Philadelphia, PA 19124
(215) 288-6500
18. Novartis Pharmaceuticals Corp.
59 Route 10
East Hanover, NJ 07936-1080
(973) 781-8300
19. Novopharm Biotech Inc.
4700 Novopharm Blvd West
Wilson, NC 27893
(252) 234-2207

20. Parke-Davis/Warner Lambert
201 Tabor Road
Morris Plains, NJ 07950
(973) 385-2000
21. Pfizer
235 East 42nd Street
New York, NY 10017
(212) 573-2323
22. Purepac
200 Elmora Ave. Ste. 2
Elizabeth, NJ 07202
(908) 527-9100
23. Roche Pharmaceuticals
340 Kingsland Street
Nutley, NJ 07110
(973) 235-5000
24. Schwarz Pharma
6140 W. Executive Dr.
Thiensville, WI 53092
(414) 354-4300
25. Schering-Plough Corp.
One Giralda Farms
P.O. Box 1000
Madison, NJ 07940-1000
(973) 822-7000
26. Searle
P.O. Box 5110
Chicago, IL 60680
(847) 982-7000
27. SmithKline Beecham
One Franklin Plaza
P.O. Box 7929
Philadelphia, PA 19101
(215) 751-4000

28. Sidmak Laboratories
17 West Street
East Hanover, NJ 07936
(973) 386-5566
29. Teva
650 Cathill Rd.
Sellersville, PA 18960
(215) 256-8400
30. Watson Pharmaceuticals Inc.
3400 W. Lake Ave.
Glenview, IL 60025
(847) 729-8470
31. Wyeth Ayerst
555 E. Lancaster Ave.
Wayne, PA 19087
(610) 971-5400
32. Zenith Goldline Pharmaceuticals
4400 Biscayne Blvd.
Miami, FL 33137
(305) 575-4100

B. Managed Care Organizations, Pharmacy Benefit Managers, and Third Party Payers

1. Aetna US Healthcare
151 Farmington Ave.
Hartford, CT 06156-3124
(860) 692-5000
2. Alliance
650 S. Cherry St.
Suite 300
Denver, CO 80246
(303) 333-6767
3. America's Health Plan
2275 Research Blvd.
Rockville, MD 20580
(301) 590-7200

4. AmeriNet
2060 Craigshare Rd.
St. Louis, MO 63146
(800) 388-2638
5. Blue Cross and Blue Shield Association
225 N. Michigan Ave.
Chicago, IL 60601-7680
(312) 297-6000
6. Blue Cross and Blue Shield Association
Federal Employees Health Plan
1310 G Street N.W.
Washington, DC 20005
(202) 626-4780
7. Care Mark, Inc.
2211 Sanders Rd.
Northbrook, IL 60062
(847) 559-4700
8. CIGNA
900 Cottage Grove Rd.
Bloomfield, CT 06002
(860) 726-6000
9. Express Scripts
14000 Riverport Dr.
Maryland Heights, MO 63043
(314) 770-1666
10. HSCA
280 South Mt. Auburn Rd.
Cape Girardeau, MO 63701
(314) 291-2920
11. Humana Group Health Plan
500 W. Main St.
Louisville, KY 40202
(502) 580-1000

12. Merck-Medco Managed Care LLC
100 Parsons Pond Dr.
Franklin Lakes, NJ 07417
(201) 358-5400
13. PCS Health Systems
9501 E. Shea Blvd
Scottsdale, AZ 85260
(480) 391-4600
14. Private Healthcare Systems
650 S. Cherry St.
Denver, CO 80246
(303) 399-1903
15. Prudential Healthcare
3E Greenway Plaza Ste. 700
Houston, TX 77046
(713) 350-2394
16. State Farm
1 State Farm Plaza
Bloomington, IL 61710-0001
(309) 966-2311
17. United Healthcare
6300 Highway 55
Minneapolis, MN 55427
(612) 797-4787

II. Relevant Documents

The following firms submitted documents that are, or may be, relevant to the allegations in the complaint, to the proposed relief, or to the respondents' defenses:

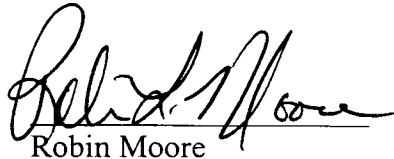
1. Andrx Corporation
2. Astra Pharmaceuticals
3. Bayer Corporation
4. Biovail Corporation
5. Blue Cross and Blue Shield Association
6. Elan Pharmaceutical Technologies

7. Faulding, Inc.
8. Hoechst Marion Roussel, Inc.
9. Merck & Company
10. Mylan Laboratories
11. National Pharmaceutical Alliance
12. Pharmaceutical Research and Manufacturers of America
13. Pfizer
14. Rhone-Poulenc Rorer
15. Searle & Co.
16. Watson Pharmaceuticals

These documents fall into four general categories: (1) documents relating to Abbreviated New Drug Applications for bioequivalent or generic versions of Cardizem CD, (2) documents relating to patent infringement litigations involving the respondents, (3) documents relating to the marketing and sales of drug products approved by, or pending before, the United States Food and Drug Administration for the treatment of hypertension, and (4) documents relating to industry analysis of the pioneer and generic pharmaceutical industries.

All documents are located at the Federal Trade Commission, Bureau of Competition, 601 Pennsylvania Avenue, N.W., Washington, DC 20580. Copies of these documents will be provided to you after Administrative Law Judge D. Michael Chappell enters a protective order in this matter.

Respectfully Submitted,



Robin Moore
Markus Meier

Counsel Supporting the Complaint

Bureau of Competition
Federal Trade Commission
Washington, D.C. 20580

Dated: 4/17, 2000

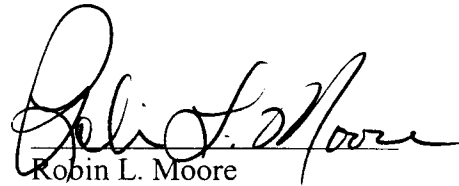
CERTIFICATE OF SERVICE

I, Robin L. Moore, hereby certify that on April 17, 2000, I caused a copy of the Complaint Counsel's Initial Disclosures to be served upon the following persons by Federal Express.

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Robin L. Moore