



confidential. That is not only unreasonable, but seriously prejudicial to Andrx's

legitimate rights and interests. What, in effect, Complaint Garnock seeks in the part of

Barz Laboratories, 162 F.R.D. 456 (S.D.N.Y. 1005) (holding

orders, which designate all discovery as protected without review by court

without a "good cause" determination are either not applicable or, if

E.R.D. 257 (D.D.C. 1987), must articulate

particular facts showing good cause for a blanket prohibition, and that there is a

specific pa

sult from discovery sought)

clearly defined, serious injury that will re

Complaint Garnock's attempt to unilaterally impose its own way of fairly carrying

and to take necessary protective measures as to its confidential information

Confidential information, in fact, in the public domain and, in addition,

Andrx recently, its concerns are not about having a single Andrx business person

its documents -- it stated it did not care about that. It simply did not want its documents

public domain, which neither Andrx nor any other party

broadly disseminated, in the n

expressed willingness of the other party to have an appropriate Andrx

seek to take

review its documents demonstrates that Garnock's (Garnock's) motion

business person

Andrx's documents and to disclose and compromise the documents



Dated: May 4, 2000.

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Re: *W.E.S. Docket*

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SECRET OR CONFIDENTIAL

CONFIDENTIAL OR SECRET

1944-5 - Source hereby verified on May 4, 2001 - cause copy

Dependent Agent Communication Committee (Securities) Case could be a violation of securities laws