

of move to quash the subpoena in toto is believ

claim that Proskauer did n

cross the subpoena, and certainly was never

Andrx

the subpoena subject to resolution of Proskauer's confidentiality is

Client Diarrail

now asks the court to grant

litigation (the "New Jersey Action") have long since

corporation to move for a protective order in related

mail documents, it has sought

subpoena from the court

mutual discovery obligations on both Andrx and Biovail

as substantial concerns regarding the

Contrary to Andrx's suggestion, Biovail h

Andrx and Biovail, however, are attempting to resolve

quash the non-privileged documents in Proskauer's possession responsive to the subpoena

New Jersey Action, which Andrx already

consist of the documents produced by Biovail in the Ne

sive documents in Proskauer's

has. Almost without exception, the balance of the respo

granted, should not be disturbed.

Dated: July 17, 2000

Respectfully submitted,


Francis C. Landrey

By: 

1585 Broadway

NEW YORK, NY 10019
(212) 692-2505

Pro Se

