

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

In the Matter of)
)
)
 Schering-Plough Corporation,)
 a corporation,)
)
 Upsher-Smith Laboratories,) Docket No. 9297
 a corporation,)
)
 and)
)
 American Home Products Corporation,)
 a corporation.)
)

SCHERING-PLOUGH CORPORATION'S REPLY MEMORANDUM IN



interrogatory at all. The remaining five excerpts do appear in complaint counsel's response, but do not respond to the interrogatory. As noted in Schering's motion, Interrogatory No. 1 asks if complaint counsel contends that consumers are worse off

citations provide factual support for the contentions set forth in the interrogatory responses.

Schering respectfully requests that the Court grant its motion to compel supplemental responses to Schering's First Set of Interrogatories.

Respectfully submitted,

John W. Nields, Jr.
Marc G. Schildkraut
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(202) 783-0800

Attorneys for Respondent
Schering-Plough Corporation

Dated: November 30, 2001

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**RESPONDENT’S MOTION FOR LEAVE TO FILE A REPLY MEMORANDUM
IN SUPPORT OF ITS MOTION TO COMPEL INTERROGATORY RESPONSES**

Pursuant to Rule 3.22(c) of the Commission's Rules of Practice, 16 C.F.R. §
3.22(c), Schering-Plough Corporation (“Respondent”) hereby respectfully requests leave
to file a brief reply to complaint counsel’s opposition to Respondent’s motion to compel
interrogatory responses.

Respectfully submitted,

John W. Nields, Jr.
Marc G. Schildkraut
Laura S. Shores
Charles A. Loughlin
HOWREY SIMON ARNOLD & WHITE LLP
1299 Pennsylvania Ave., N.W.
Washington, D.C. 20004
(202) 783-0800

Attorneys for Respondent
Schering-Plough Corporation

Dated: November 30, 2001

CERTIFICATE OF SERVICE

I hereby certify that this 30th day of November, 2001, I caused an original, one paper copy and an electronic copy of the foregoing Respondent's Motion for Leave to File A Reply Memorandum in Support of its Motion to Compel Interrogatory Responses and Memorandum In

CERTIFICATION

I hereby certify that this 30th day of November, 2001, I caused an electronic copy of Respondent's Motion for Leave to File A Reply Memorandum in Support of its Motion to Compel Interrogatory Responses and Memorandum In Support of its Motion to Compel to be filed with the Secretary of the Commission. I further certify that these are true and correct copies of the paper original and that a paper copy with an original signature is being filed with the Secretary of the Commission.

Erik T. Koons