

documents reveal agreement terms, business data such as pricing, cost and sales forecasts, and proprietary data regarding Schering's ongoing and future design, development, marketing and promotion strategies. This information is extremely

Respectfully submitted

Laura S. Shores
Charles A. Loughlin

UNITED STATES OF AMERICA

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

advanced in that motion, supporting memorandum, and declaration of David Poorvin are equally applicable to these trial exhibits designated by Complaint Counsel. Respondent therefore incorporates by reference the arguments advanced in that motion and supporting papers and

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2013, development cost estimates, information regarding the size and structure of licensing fees
and milestone payments, extensive clinical data and testing information, market share analysis

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

UNITED STATES OF AMERICA

 _____)
In the Matter of)
_____)
_____)

5. The documents that are the subject of this motion and declaration are identical, and/or substantially similar in all relevant respects, to the confidential documents that are the

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Contract General has also identified 22 additional individuals who

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12. As such, the documents contain secret information that is material to Schering business, competitiveness and profitability. Release of this information will cause the loss of

[REDACTED]

CERTIFICATE OF SERVICE

I, Joseph, certify that this 27th day of December, 2001, I caused to be filed

with the

the

of

at

and

by

me,

Joseph

and

attorney

for

the