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**UNITED STATES OF AMERICA
BEFORE F**

II. RESPONDENTS

4. Respondent Actavis is a corporation organized, existing, and doing business under and by virtue of the laws of Iceland, with its headquarters address at Dalshraun 1, 220 Hafnarfjordur, Iceland.. Actavis's principal subsidiary in the United States, Actavis U.S., is located at 14 Commerce Drive, Suite 301, Cranford, New Jersey 07016. Actavis is engaged in the research, development, manufacture, and sale of generic pharmaceutical products.

5. Respondent Abrika is a corporation organized, existing, and doing business under and by virtue of the laws of the State of Delaware, with its headquarters address at 13800 N.W. 2nd Street, Suite 190, Sunrise, Florida 33325. Abrika is engaged in the research, development, manufacture, and sale of generic pharmaceutical products.

6. Respondents are, and at all times relevant herein have been, engaged in commerce, as "commerce" is defined in Section 1 of the Clayton Act as amended, 15 U.S.C. § 12, and are corporations whose business is in or affects commerce, as "commerce" is defined in Section 4 of the Federal Trade Commission Act, as amended, 15 U.S.C. § 44.

III. THE PROPOSED ACQUISITION

7. On November 20, 2006, Actavis and Abrika entered into an Agreement and Plan of Merger (the "Merger Agreement") whereby Actavis proposes to acquire 100 percent of the issued and outstanding voting securities of Abrika in a transaction valued at approximately \$235 million (the "Acquisition").

IV. THE RELEVANT MARKET

8. For the purposes of this Complaint, the relevant line of commerce in which to analyze the effects of the Acquisition is the manufacture and sale of generic isradipine capsules.

9. For the purposes of this Complaint, the United States is the relevant geographic area in which to analyze the effects of the Acquisition in the relevant line of commerce.

V. THE STRUCTURE OF THE MARKET

10. The market for the manufacture and sale of generic isradipine capsules is highly concentrated with a pre-acquisition Herfindahl-Hirschman Index ("HHI") of 8,872 points. Isradipine capsules are calcium channel blockers that relax blood vessels and reduce the workload on the heart. Currently, Actavis and Abrika are the only suppliers of generic isradipine in the United States with market shares of 6 percent and 94 percent, respectively. The Acquisition would create a monopoly in this market and increase the HHI concentration by 1,128 points, resulting in a post-acquisition HHI of 10,000 points.

