Office ofthe Director
Bureau of Competition

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION WASHINGTON, D.C. 20580

MAR 1 02009

Melvin Orlans, Esq.
Hunton & Williams LLP
1900 K Street, NW
Washington, D.C. 20006-1109

Re: VCE Pharma Inc./Keppra, FTC File No. 081-0031.

Dear Mr. Orlans:

The Federal Trade Commission's Bureau ofCompetition conducted a nonpublic investigation to detennine whether your client, UCB Phanna, Inc., had engaged or was engaging in, unfair methods of competition in or affecting commerce in violation of Section 5 ofthe Federal