

**UNITED STATES OF AMERICA
BEFORE THE 1/w.34 0 Td [(TH)-9E**

4. Meda is, and at all times relevant herein has been, engaged in commerce, as “commerce” is defined in Section 1 of the Clayton Act as amended, 15 U.S.C. § 12, and is a corporation whose business is in or affects commerce, as “commerce” is defined in Section 4 of the FTC Act, as amended, 15 U.S.C. § 44.

III. THE PROPOSED ACQUISITION

5. Pursuant to a public offer to the shareholders of Meda announced on February 10, 2016, Respondent intends to acquire 100% of the issued and outstanding shares of Meda for a total equity value at announcement of approximately \$7.2 billion in a combination of cash and the Respondent’s ordinary shares (the “Acquisition”). The Acquisition is subject to Section 7 of the Clayton Act, as amended, 15 U.S.C. § 18.

IV. THE RELEVANT MARKETS

6. For the purposes of this Complaint, the relevant lines of commerce in which to analyze the effects of the Acquisition are the development, license, manufacture, marketing, distribution, and sale of the following pharmaceutical products:

- a. 400 mg and 600 mg generic felbamate tablets; and
- b. 250 mg generic carisoprodol tablets.

7. For the purposes of this Complaint, the United States is the relevant geographic

