

**From:** Rachelle Galant </O=ONETEAM/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS /CN=RGALANT>  
**To:** Michael Perfetto  
**CC:** Lisa Pehlke; Nancy Baran; Jinping McCormick  
**Sent:** 3/17/2011 4:01:03 PM  
**Subject:** Cardinal's Oxy 15mg suspicious ordering  
**Attachments:** image001.jpg; image003.jpg; image004.gif; Oxy IR Tabs Suspicious Order SOP revised 3-17-2011.doc

Mike,

Cardinal's ordering on the 15mg Oxy IR tabs is in excess of their rolling 6 month average.

Their six month average is 12, 480. Month to date, they have been shipped 20,112 bottles. Based on where we are in the month (52%), this falls under our SOP of suspicious ordering.

Can you please contact the customer and inquire as to what the reason is behind the ordering? I know the market is seeing shortages with our competitors, we need documentation to continue shipping Cardinal on the 15mg.

Attached is the SOP for your reference. Please contact me with any questions. If you could target getting back to me within 3 business days, that would be appreciated. Cardinal's future orders for 15mg Oxy IR will not be shipped until we have resolution.

Many thanks,

Rachelle

Oxycodone IR Tablets

Suspicious Order Tracking

Customer: Cardinal Health

Customer Contact Procedure

Date

Strength

6 month shipment Average

Current Month shipment

Actavis Sales Team Member

Date

Form of communication (email, in person, phone)

Customer Name and Position

Reason given for higher volume in orders

Actavis Decision

3/17/2011

15mg

12480

20112

Mike Perfetto

Lisa Pehlke



**Confidential**

**Acquired\_Actavis\_00265989**

**P-02468 \_ 00001**

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Product Manager

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**Suspicious Order Report for Oxycodone IR Tablets  
Standard Operating Procedure  
Commercial**

<b>Action</b>	<b>Responsibility</b>
1. <b>Monitor Monthly Customer Orders.</b> Run a Monthly tracking report at a minimum of once per month in the Actavis order reporting system, for Oxycodone IR Tablets. Export the file into Excel and store on the shared Marketing file for Oxycodone IR Suspicious Order tracking.	Marketing – Product Manager
a. Compare the month – to – date orders for each customer, down to the customer DC level, against the rolling six month order history. Identify any individual customer locations that have ordered 50% or greater than their established six month order average. These customer’s will be noted in the Suspicious Order Tracking Form – see attachment A	Product Manager
b. Forward the Suspicious Customer Order Tracking Form to the VP of Sales and individual sales team account representative, with details of order history and current month to date order status.	Product Manager
c. Contact customer service and have the open orders for the specific account placed on “HOLD” status until the inquiry is completed and resolved. Customer service may alert the specific customer that the open orders are placed on hold due to inquiry of order tracking.	
2. <b>Customer Inquiry.</b> Contact each customer, within a target timeframe of 3 business days, who is on the monthly Suspicious Order Tracking form, either by email, in person, or phone, regarding the higher volume orders. Note reasons for the order volume and duration that the orders will be increased	VP of Sales Team
3. <b>Documentation of Follow-Up</b>	
a. Forward all details of customer communication to the Marketing Product Manager via email, within a one week time frame.	VP of Sales / Sales Team
b. Fill in Suspicious Order Tracking Form (Attachment A) with details of customer communication.	
c. Send file back to the Marketing Product Manager. This file will be stored on the Marketing shared drive.	
4. <b>Decision Regarding Future Customer Shipments</b>	
a. Based on feedback from the customer, make a determination whether to continue shipping the customer. The following criteria may be applied to help with the decision: new customer (still establishing 6 month history), market growth, market shortage, expansion of customer business (adding new stores, channels)	Marketing/ Customer Service Sales team
b. If the decision has been made to not ship the customer’s open orders, notify customer service to have the orders/account placed on suspended status.	<b>Marketing – Product Manager</b> <b>Marketing/Customer Service</b>
c. Notify appropriate personnel with the details of the orders and order history. Keep the open orders and any new orders that come in on the customer location on Hold status until clearance is given to resume shipping the customer	

**Oxycodone IR Tablets  
Suspicious Order Tracking  
Customer:**

Date	Strength	6 month Order Average	Current Month Order	Customer Contact Procedure						Actavis Decision
				Actavis Sales Team Member	Date	Form of communication (email, in person, phone)	Customer Name and Position	Reason given for higher volume in orders		