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11 Actavis Totowa LLC, Actavis LLC, Actavis Kadian  
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12 Laboratories, Inc.- Salt Lake City, and Actavis  
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13 Florida*

14 **UNITED STATES DISTRICT COURT**  
15 **NORTHERN DISTRICT OF CALIFORNIA**  
16 **SAN FRANCISCO DIVISION**

17 CITY AND COUNTY OF SAN  
FRANCISCO, et al.,

18  
19 Plaintiffs,

20  
21 v.

22 PURDUE PHARMA L.P., et al.,

23  
24 Defendants.

Case No. 18-cv-07591-CRB-JSC

**ANSWER TO FIRST AMENDED  
COMPLAINT FOR: (1) VIOLATION OF  
RACKETEER INFLUENCED AND  
CORRUPT ORGANIZATIONS ACT  
(OPIOID MARKETING ENTERPRISE);  
(2) VIOLATION OF RACKETEER  
INFLUENCED AND CORRUPT  
ORGANIZATIONS ACT (OPIOID SUPPLY  
CHAIN ENTERPRISE; (3) PUBLIC  
NUISANCE; (4) VIOLATION OF  
CALIFORNIA UNFAIR COMPETITION  
LAW; AND (5) VIOLATION OF  
CALIFORNIA FALSE ADVERTISING  
LAW**

Dept.:Courtroom 6  
Honorable Charles R. Breyer

**PLAINTIFFS TRIAL  
EXHIBIT  
P-04804\_00001**

**ANSWER AND AFFIRMATIVE DEFENSES OF  
WATSON LABORATORIES, INC., WARNER CHILCOTT COMPANY, LLC, ACTAVIS  
PHARMA, INC., F/K/A WATSON PHARMA, INC., ACTAVIS SOUTH ATLANTIC,  
LLC, ACTAVIS ELIZABETH LLC, ACTAVIS MID ATLANTIC LLC, ACTAVIS  
TOTOWA LLC, ACTAVIS LLC, ACTAVIS KADIAN, LLC, ACTAVIS  
LABORATORIES UT, INC. F/K/A WATSON LABORATORIES, INC.- SALT LAKE  
CITY, AND ACTAVIS LABORATORIES FL, INC. F/K/A  
WATSON LABORATORIES, INC.-FLORIDA**

Defendant WATSON LABORATORIES, INC., WARNER CHILCOTT COMPANY, LLC, ACTAVIS PHARMA, INC. F/K/A WATSON PHARMA, INC., ACTAVIS SOUTH ATLANTIC LLC, ACTAVIS ELIZABETH LLC, ACTAVIS MID ATLANTIC LLC, ACTAVIS TOTOWA LLC, ACTAVIS LLC, ACTAVIS KADIAN LLC, ACTAVIS LABORATORIES UT, INC., F/K/A WATSON LABORATORIES, INC. –SALT LAKE CITY, and ACTAVIS LABORATORIES FL, INC. F/K/A WATSON LABORATORIES, INC.- FLORIDA (hereinafter “Defendant” or the “Actavis Generic Entities”) by and through its undersigned counsel, hereby submit their Answer, Defenses and Affirmative Defenses responding, by corresponding paragraph numbers, to each of the numbered paragraphs in the Amended Complaint (“Complaint”) of Plaintiffs, City and County of San Francisco (“Plaintiffs”).

**PRELIMINARY STATEMENT**

The following matters are incorporated by reference into the Actavis Generic Entities’ responses to each paragraph of the Complaint.

A. The Actavis Generic Entities submit this Answer, Defenses and Affirmative Defenses (“Answer”) only on behalf of themselves. Where allegations are made against “Defendants” as a group, however described, the Actavis Generic Entities’ responses only apply to themselves. To the extent that the Complaint defines “Actavis” to include the Actavis Generic Entities and any other entities, subsidiaries or affiliates, the Actavis Generic Entities’ responses to allegations referring to “Actavis” are submitted only on behalf of the Actavis Generic Entities as defined above. For clarity, in August 2016, Teva Pharmaceuticals USA, Inc. acquired the generic business lines of the Actavis Generic Entities. Those generic business lines have only ever sold generic opioid medicines.

1 B. The Complaint contains purported references to several documents and third-party  
2 publications and statements that have often been excerpted, paraphrased, characterized, and  
3 otherwise taken out of context. These third-party publications and statements should be considered,  
4 if at all, in context and in unmodified form, and the Actavis Generic Entities hereby respectfully  
5 refer the Court to the respective third-party publications and statements for their complete contents.

6 C. Except as otherwise expressly stated herein, the Actavis Generic Entities' expressly  
7 deny each and every allegation contained in the Complaint, including without limitation any  
8 allegations contained in the preamble, unnumbered paragraphs, subparagraphs, headings,  
9 subheadings, table of contents, footnotes, and exhibits of the Complaint, and specifically deny any  
10 liability to Plaintiffs. To the extent that the titles, headings, subheadings, paragraphs, and footnotes  
11 of the Complaint are intended to be allegations directed to the Actavis Generic Entities they are,  
12 unless otherwise admitted, denied.

13 D. The Actavis Generic Entities reserve the right to seek to amend and supplement its  
14 Answer as may be appropriate or necessary.

15 **ADMISSIONS AND DENIALS**

16 1. The allegations in Paragraph 1 state argument and conclusions of law to which no  
17 response is required. To the extent a response is required, the Actavis Generic Entities deny the  
18 allegations in Paragraph 1.

19 2. The allegations in Paragraph 2 state argument and conclusions of law to which no  
20 response is required. To the extent that allegations in Paragraph 2 relate to parties other than the  
21 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
22 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
23 extent a response is required, the Actavis Generic Entities deny the remaining allegations of  
24 Paragraph 2.

25 3. The allegations in Paragraph 3 state argument and conclusions of law to which no  
26 response is required. To the extent that the allegations in Paragraph 3 relate to parties other than  
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1 the Actavis Generic Entities, the Actavis Generic Entities is without knowledge or information  
2 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
3 extent that the allegations in Paragraph 3 purport to be based on documents, those documents speak  
4 for themselves, and all characterizations thereof are denied. To the extent a response is required,  
5 the Actavis Generic Entities deny the remaining allegations in Paragraph 3.

6 4. To the extent that the allegations in Paragraph 4 relate to parties other than the  
7 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
8 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
9 extent that the allegations in Paragraph 4 purport to be based on documents, those documents speak  
10 for themselves, and all characterizations thereof are denied. The Actavis Generic Entities deny the  
11 remaining allegations in Paragraph 4.

12 5. The allegations in Paragraph 5 state argument and conclusions of law to which no  
13 response is required. To the extent that the allegations in Paragraph 5 relate to parties other than  
14 the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
15 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
16 extent that the allegations in Paragraph 5 purport to be based on documents, those documents speak  
17 for themselves, and all characterizations thereof are denied. To the extent a response is required,  
18 the Actavis Generic Entities deny the remaining allegations in Paragraph 5.

19 6. The allegations in Paragraph 6 are based on and quote from documents and/or  
20 speeches that speak for themselves, and all characterizations thereof are denied.

21 7. The allegations in Paragraph 7 state argument and conclusions of law to which no  
22 response is required. To the extent that the allegations in Paragraph 7 relate to parties other than  
23 the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
24 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
25 extent a response is required, the Actavis Generic Entities deny the remaining allegations in  
26 Paragraph 7.

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1           8.       To the extent that the allegations in Paragraph 8 relate to parties other than the  
2 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
3 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
4 Actavis Generic Entities deny the remaining allegations in Paragraph 8.

5           9.       To the extent that the allegations in Paragraph 9 relate to parties other than the  
6 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
7 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
8 Actavis Generic Entities deny the remaining allegations in Paragraph 9.

9           10.      To the extent that the allegations in Paragraph 10 relate to parties other than the  
10 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
11 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
12 Actavis Generic Entities deny the remaining allegations in Paragraph 10.

13           11.      To the extent that the allegations in Paragraph 11 relate to parties other than the  
14 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
15 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
16 extent that the allegations in Paragraph 11 purport to be based on documents, those documents  
17 speak for themselves, and all characterizations thereof are denied. The Actavis Generic Entities  
18 deny the remaining allegations in Paragraph 11.

19           12.      The allegations in Paragraph 12 state argument and conclusions of law to which no  
20 response is required. To the extent that the allegations in Paragraph 12 relate to parties other than  
21 the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
22 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
23 extent a response is required, the Actavis Generic Entities deny the remaining allegations of  
24 Paragraph 12.

25           13.      To the extent that the allegations in Paragraph 13 purport to be based on documents,  
26 those documents speak for themselves, and all characterizations thereof are denied. The Actavis  
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1 Generic Entities are without knowledge or information sufficient to form a belief as to the truth of  
2 the allegations of Paragraph 13 and therefore deny the same.

3 14. The allegations in Paragraph 14 state argument and conclusions of law to which no  
4 response is required. To the extent that the allegations in Paragraph 14 relate to parties other than  
5 the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
6 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
7 extent that the allegations in Paragraph 14 purport to be based on documents, including those  
8 referred to in footnote 5, those documents speak for themselves, and all characterizations thereof  
9 are denied. To the extent that a response is required, the Actavis Generic Entities deny the  
10 remaining allegations in Paragraph 14.

11 15. The allegations in Paragraph 15 state argument and conclusions of law to which no  
12 response is required. To the extent that the allegations in Paragraph 15 relate to parties other than  
13 the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
14 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
15 extent that the allegations in Paragraph 15 purport to be based on documents and/or quotes,  
16 including those referred to in footnote 6, those documents and/or quotes speak for themselves, and  
17 all characterizations thereof are denied. To the extent that a response is required, the Actavis  
18 Generic Entities deny the remaining allegations in Paragraph 15.

19 16. The allegations in Paragraph 16 state argument and conclusions of law to which no  
20 response is required. To the extent that the allegations in Paragraph 16 relate to parties other than  
21 the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
22 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
23 extent that a response is required, the Actavis Generic Entities deny the remaining allegations in  
24 Paragraph 16.

25 17. The allegations in Paragraph 17 state argument and conclusions of law to which no  
26 response is required. To the extent that the allegations in Paragraph 17 relate to parties other than  
27 the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
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1 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
2 extent that a response is required, the Actavis Generic Entities deny the remaining allegations in  
3 Paragraph 17.

4 18. To the extent that the allegations in Paragraph 18 purport to be based on documents,  
5 including those referred to in footnotes 7, 8 and 9, those documents speak for themselves, and all  
6 characterizations thereof are denied. The Actavis Generic Entities are without knowledge or  
7 information sufficient to form a belief as to the truth of the allegations of Paragraph 18 and therefore  
8 deny the same.

9 19. To the extent that the allegations in Paragraph 19 purport to be based on documents,  
10 including those referred to in footnotes 10 and 11, those documents speak for themselves, and all  
11 characterizations thereof are denied. The Actavis Generic Entities are without knowledge or  
12 information sufficient to form a belief as to the truth of the allegations of Paragraph 19 and therefore  
13 deny the same.

14 20. To the extent that the allegations in Paragraph 20 relate to parties other than the  
15 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
16 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
17 Actavis Generic Entities deny the remaining allegations in Paragraph 20.

18 21. To the extent that the allegations in Paragraph 21 relate to parties other than the  
19 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
20 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
21 extent that the allegations in Paragraph 21 purport to be based on documents, those documents  
22 speak for themselves, and all characterizations thereof are denied. The Actavis Generic Entities are  
23 without knowledge or information sufficient to form a belief as to the truth of the remaining  
24 allegations of Paragraph 21 and therefore deny the same.

25 22. The allegations in Paragraph 22 state argument and conclusions of law to which no  
26 response is required. To the extent that allegations in Paragraph 22 relate to parties other than the  
27 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
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1 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
2 extent a response is required, the Actavis Generic Entities deny the remaining allegations in  
3 Paragraph 22.

4 23. The Actavis Generic Entities admit only that certain opioids have been approved to  
5 treat short-term post-surgical and trauma-related pain and for palliative care. The Actavis Generic  
6 Entities further admit that the indications and known risks related to The Actavis Generic Entities'  
7 opioid products are disclosed and addressed in the FDA-approved Full Prescribing Information  
8 ("FPI"), as required and approved by the FDA. Those FPIs are documents that speak for  
9 themselves, and any characterizations that are different than or inconsistent with the FPIs are  
10 denied. To the extent that remaining allegations in Paragraph 23 relate to parties other than the  
11 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
12 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
13 Actavis Generic Entities deny the remaining allegations in Paragraph 23.

14 24. The Actavis Generic Entities admit that opioid analgesics may cause physical  
15 dependence and that physical dependence can result in withdrawal symptoms in patients who  
16 abruptly discontinue the use of opioids. The Actavis Generic Entities further admit that dependence  
17 and withdrawal are known risks which are disclosed and addressed in the FPIs of their opioid  
18 products, as required and approved by the FDA. Those FPIs are documents that speak for  
19 themselves, and any characterizations that are different than or inconsistent with the FPIs are  
20 denied. The Actavis Generic Entities deny the remaining allegations of Paragraph 24.

21 25. The Actavis Generic Entities admit that the indications and known risks related to  
22 the Actavis Generic Entities' opioid products are disclosed and addressed in the FDA-approved  
23 FPI, as required and approved by the FDA. Those FPIs are documents that speak for themselves,  
24 and any characterizations that are different than or inconsistent with the FPIs are denied. To the  
25 extent that the allegations in Paragraph 25 relate to parties other than the Actavis Generic Entities,  
26 the Actavis Generic Entities are without knowledge or information sufficient to form a belief as to  
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1 the truth of those allegations and therefore deny the same. The Actavis Generic Entities deny the  
2 remaining allegations in Paragraph 25.

3 26. To the extent that the allegations in Paragraph 26 relate to parties other than the  
4 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
5 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
6 Actavis Generic Entities deny the remaining allegations in Paragraph 26.

7 27. To the extent that the allegations in Paragraph 27 relate to parties other than the  
8 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
9 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
10 Actavis Generic Entities deny the remaining allegations in Paragraph 27.

11 28. To the extent that the allegations in Paragraph 28 relate to parties other than the  
12 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
13 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
14 extent that the allegations in Paragraph 28 purport to be based on documents, including those  
15 referred to in footnote 13, those documents speak for themselves, and all characterizations thereof  
16 are denied. The Actavis Generic Entities deny the remaining allegations in Paragraph 28.

17 29. To the extent that the allegations in Paragraph 29 relate to parties other than the  
18 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
19 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
20 extent that the allegations in Paragraph 29 purport to be based on documents, those documents  
21 speak for themselves, and all characterizations thereof are denied. The Actavis Generic Entities  
22 deny the remaining allegations in Paragraph 29.

23 30. To the extent that the allegations in Paragraph 30 relate to parties other than the  
24 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
25 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
26 extent that the allegations in Paragraph 30 purport to be based on documents, including those  
27 referred to in footnotes 14, 15, 16 and 17, those documents speak for themselves, and all  
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1 characterizations thereof are denied. The Actavis Generic Entities deny the remaining allegations  
2 in Paragraph 30.

3 31. To the extent that the allegations in Paragraph 31 relate to parties other than the  
4 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
5 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
6 extent that the allegations in Paragraph 31 purport to be based on documents, including those  
7 referred to in footnote 18, those documents speak for themselves, and all characterizations thereof  
8 are denied. The Actavis Generic Entities deny the remaining allegations in Paragraph 31.

9 32. To the extent that the allegations in Paragraph 32 relate to parties other than the  
10 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
11 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
12 extent that the allegations in Paragraph 32 purport to be based on documents, including those  
13 referred to in footnote 19, those documents speak for themselves, and all characterizations thereof  
14 are denied. The Actavis Generic Entities deny the remaining allegations in Paragraph 32.

15 33. To the extent that the allegations in Paragraph 33 relate to parties other than the  
16 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
17 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
18 Actavis Generic Entities deny the remaining allegations in Paragraph 33.

19 34. The allegations in Paragraph 34 are not directed to the Actavis Generic Entities and,  
20 thus, no response is required. To the extent a response is required, the Actavis Generic Entities are  
21 without knowledge or information sufficient to form a belief as to the truth of those allegations and  
22 therefore deny the same.

23 35. To the extent that the allegations in Paragraph 35 relate to parties other than the  
24 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
25 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
26 extent that the allegations in Paragraph 35 purport to be based on documents, including those  
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1 referred to in footnote 22, those documents speak for themselves, and all characterizations thereof  
2 are denied. The Actavis Generic Entities deny the remaining allegations in Paragraph 35.

3 36. To the extent that the allegations in Paragraph 36 relate to parties other than the  
4 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
5 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
6 extent that the allegations in Paragraph 36 purport to be based on documents and/or quotes, those  
7 documents and/or quotes speak for themselves, and all characterizations thereof are denied. The  
8 Actavis Generic Entities deny the remaining allegations in Paragraph 36.

9 37. To the extent that the allegations in Paragraph 37 relate to parties other than the  
10 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
11 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
12 extent that the allegations in Paragraph 37 purport to be based on documents, including those  
13 referred to in footnote 23, those documents speak for themselves, and all characterizations thereof  
14 are denied. The Actavis Generic Entities deny the remaining allegations in Paragraph 37.

15 38. To the extent that the allegations in Paragraph 38 relate to parties other than the  
16 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
17 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
18 extent that the allegations in Paragraph 38 purport to be based on documents, those documents  
19 speak for themselves, and all characterizations thereof are denied. The Actavis Generic Entities  
20 deny the remaining allegations in Paragraph 38.

21 39. To the extent that the allegations in Paragraph 39 relate to parties other than the  
22 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
23 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
24 extent that the allegations in Paragraph 39 purport to be based on documents, those documents  
25 speak for themselves, and all characterizations thereof are denied. The Actavis Generic Entities  
26 deny the remaining allegations in Paragraph 39.

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1           40. To the extent that the allegations in Paragraph 40 relate to parties other than the  
2 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
3 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
4 extent that the allegations in Paragraph 40 purport to be based on documents, those documents  
5 speak for themselves, and all characterizations thereof are denied. The Actavis Generic Entities  
6 deny the remaining allegations in Paragraph 40.

7           41. To the extent that the allegations in Paragraph 41 relate to parties other than the  
8 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
9 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
10 extent that the allegations in Paragraph 41 purport to be based on documents, those documents  
11 speak for themselves, and all characterizations thereof are denied. The Actavis Generic Entities  
12 deny the remaining allegations in Paragraph 41.

13           42. To the extent that the allegations in Paragraph 42 relate to parties other than the  
14 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
15 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
16 extent that the allegations in Paragraph 42 purport to be based on documents, those documents  
17 speak for themselves, and all characterizations thereof are denied. The Actavis Generic Entities  
18 deny the remaining allegations in Paragraph 42.

19           43. To the extent that the allegations in Paragraph 43 relate to parties other than the  
20 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
21 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
22 extent that the allegations in Paragraph 43 purport to be based on documents, those documents  
23 speak for themselves, and all characterizations thereof are denied. The Actavis Generic Entities  
24 deny the remaining allegations in Paragraph 43..

25           44. To the extent that the allegations in Paragraph 44 relate to parties other than the  
26 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
27 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
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1 extent that the allegations in Paragraph 44 purport to be based on documents, those documents  
2 speak for themselves, and all characterizations thereof are denied. The Actavis Generic Entities  
3 deny the remaining allegations in Paragraph 44.

4 45. The allegations in Paragraph 45 are not directed to the Actavis Generic Entities and,  
5 thus, no response is required. To the extent a response is required, the Actavis Generic Entities are  
6 without knowledge or information sufficient to form a belief as to the truth of those allegations and  
7 therefore deny the same.

8 46. The allegations in Paragraph 46 are not directed to the Actavis Generic Entities and,  
9 thus, no response is required. To the extent a response is required, the Actavis Generic Entities are  
10 without knowledge or information sufficient to form a belief as to the truth of those allegations and  
11 therefore deny the same.

12 47. The allegations in Paragraph 47 are not directed to the Actavis Generic Entities and,  
13 thus, no response is required. To the extent a response is required, the Actavis Generic Entities are  
14 without knowledge or information sufficient to form a belief as to the truth of those allegations and  
15 therefore deny the same.

16 48. To the extent that the allegations in Paragraph 48 relate to parties other than the  
17 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
18 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
19 extent that the allegations in Paragraph 48 purport to be based on documents, those documents  
20 speak for themselves, and all characterizations thereof are denied. The Actavis Generic Entities  
21 deny the remaining allegations in Paragraph 48.

22 49. To the extent that the allegations in Paragraph 49 relate to parties other than the  
23 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
24 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
25 extent that the allegations in Paragraph 49 purport to be based on documents, including those  
26 referred to in footnote 26, those documents speak for themselves, and all characterizations thereof  
27 are denied. The Actavis Generic Entities deny the remaining allegations in Paragraph 49.

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1           50.     The allegations in Paragraph 50 state argument and conclusions of law to which no  
2 response is required. To the extent that the allegations in Paragraph 50 relate to parties other than  
3 the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
4 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
5 extent a response is required, the Actavis Generic Entities deny the remaining allegations in  
6 Paragraph 50.

7           51.     To the extent that the allegations in Paragraph 51 relate to parties other than the  
8 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
9 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
10 extent that the allegations in Paragraph 51 purport to be based on documents, those documents  
11 speak for themselves, and all characterizations thereof are denied. The Actavis Generic Entities  
12 deny the remaining allegations in Paragraph 51.

13           52.     To the extent that the allegations in Paragraph 52 purport to be based on documents,  
14 including those referred to in footnote 27, those documents speak for themselves, and all  
15 characterizations thereof are denied. The Actavis Generic Entities are without knowledge or  
16 information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 52  
17 and therefore deny the same.

18           53.     To the extent that the allegations in Paragraph 53 purport to be based on documents  
19 and/or charts, including those referred to in footnote 28, those documents and/or charts speak for  
20 themselves, and all characterizations thereof are denied. The Actavis Generic Entities are without  
21 knowledge or information sufficient to form a belief as to the truth of the remaining allegations of  
22 Paragraph 53 and therefore deny the same.

23           54.     To the extent that the allegations in Paragraph 54 purport to be based on documents  
24 and/or charts, including those referred to in footnote 29, those documents and/or charts speak for  
25 themselves, and all characterizations thereof are denied. The Actavis Generic Entities are without  
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1 knowledge or information sufficient to form a belief as to the truth of the remaining allegations of  
2 Paragraph 54 and therefore deny the same.

3 55. To the extent that the allegations in Paragraph 55 purport to be based on documents,  
4 including those referred to in footnotes 30 and 31, those documents speak for themselves, and all  
5 characterizations thereof are denied. The Actavis Generic Entities are without knowledge or  
6 information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 55  
7 and therefore deny the same.

8 56. To the extent that the allegations in Paragraph 56 purport to be based on documents,  
9 including those referred to in footnotes 32 and 33, those documents speak for themselves, and all  
10 characterizations thereof are denied. The Actavis Generic Entities are without knowledge or  
11 information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 56  
12 and therefore deny the same.

13 57. To the extent that the allegations in Paragraph 57 purport to be based on  
14 documents, those documents speak for themselves, and all characterizations thereof are denied. The  
15 Actavis Generic Entities are without knowledge or information sufficient to form a belief as to the  
16 truth of the remaining allegations of Paragraph 57 and therefore deny the same.

17 58. The allegations in Paragraph 58 state argument and conclusions of law to which no  
18 response is required. To the extent that the allegations in Paragraph 58 relate to parties other than  
19 the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
20 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
21 extent that the allegations in Paragraph 58 purport to be based on documents, including those  
22 referred to in footnote 34, those documents speak for themselves, and all characterizations thereof  
23 are denied. To the extent a response is required, the Actavis Generic Entities deny the allegations  
24 in Paragraph 58.

25 59. The allegations in Paragraph 59 state argument and conclusions of law to which no  
26 response is required. To the extent that the allegations in Paragraph 59 relate to parties other than  
27 the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
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1 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
2 extent that the allegations in Paragraph 59 purport to be based on documents, those documents  
3 speak for themselves, and all characterizations thereof are denied. To the extent a response is  
4 required, the Actavis Generic Entities deny the allegations in Paragraph 59.

5 60. The Actavis Generic Entities are without knowledge or information sufficient to  
6 form a belief as to the truth of the allegations of Paragraph 60 and therefore deny the same.

7 61. To the extent that the allegations in Paragraph 61 purport to be based on documents,  
8 including those referred to in footnotes 35, 36, 37, 38 and 39, those documents speak for  
9 themselves, and all characterizations thereof are denied. The Actavis Generic Entities are without  
10 knowledge or information sufficient to form a belief as to the truth of the remaining allegations of  
11 Paragraph 61 and therefore deny the same.

12 62. To the extent that the allegations in Paragraph 62 purport to be based on documents,  
13 including those referred to in footnotes 40 and 41, those documents speak for themselves, and all  
14 characterizations thereof are denied. The Actavis Generic Entities are without knowledge or  
15 information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 62  
16 and therefore deny the same.

17 63. To the extent that the allegations in Paragraph 63 purport to be based on documents,  
18 including those referred to in footnote 42, those documents speak for themselves, and all  
19 characterizations thereof are denied. The Actavis Generic Entities are without knowledge or  
20 information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 63  
21 and therefore deny the same.

22 64. To the extent that the allegations in Paragraph 64 purport to be based on documents,  
23 including those referred to in footnotes 43, 44 and 45, those documents speak for themselves, and  
24 all characterizations thereof are denied. The Actavis Generic Entities are without knowledge or  
25 information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 64  
26 and therefore deny the same.

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1           65. To the extent that the allegations in Paragraph 65 purport to be based on documents,  
2 including those referred to in footnotes 46 and 47, those documents speak for themselves, and all  
3 characterizations thereof are denied. The Actavis Generic Entities are without knowledge or  
4 information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 65  
5 and therefore deny the same.

6           66. To the extent that the allegations in Paragraph 66 purport to be based on documents,  
7 including those referred to in footnotes 48 and 49, those documents speak for themselves, and all  
8 characterizations thereof are denied. The Actavis Generic Entities are without knowledge or  
9 information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 66  
10 and therefore deny the same.

11           67. To the extent that the allegations in Paragraph 67 purport to be based on documents,  
12 including those referred to in footnotes 50 and 51, those documents speak for themselves, and all  
13 characterizations thereof are denied. The Actavis Generic Entities are without knowledge or  
14 information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 67  
15 and therefore deny the same.

16           68. To the extent that the allegations in Paragraph 68 purport to be based on documents,  
17 including those referred to in footnote 52, those documents speak for themselves, and all  
18 characterizations thereof are denied. The Actavis Generic Entities are without knowledge or  
19 information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 68  
20 and therefore deny the same.

21           69. To the extent that the allegations in Paragraph 69 purport to be based on documents,  
22 including those referred to in footnote 53, those documents speak for themselves, and all  
23 characterizations thereof are denied. The Actavis Generic Entities are without knowledge or  
24 information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 69  
25 and therefore deny the same.

26           70. To the extent that the allegations in Paragraph 70 purport to be based on documents  
27 and/or quotes, including those referred to in footnotes 54 and 55, those documents speak for  
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1 themselves, and all characterizations thereof are denied. The Actavis Generic Entities are without  
2 knowledge or information sufficient to form a belief as to the truth of the remaining allegations of  
3 Paragraph 70 and therefore deny the same.

4 71. To the extent that the allegations in Paragraph 71 purport to be based on documents,  
5 those documents speak for themselves, and all characterizations thereof are denied. The Actavis  
6 Generic Entities are without knowledge or information sufficient to form a belief as to the truth of  
7 the remaining allegations of Paragraph 71 and therefore deny the same.

8 72. The allegations in Paragraph 72 state argument and conclusions of law to which no  
9 response is required. To the extent that the allegations in Paragraph 72 relate to parties other than  
10 the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
11 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
12 extent that the allegations in Paragraph 72 purport to be based on statutes, laws or regulations, those  
13 statutes, laws and regulations speak for themselves, and all characterizations thereof are denied. To  
14 the extent a response is required, the Actavis Generic Entities deny the remaining allegations in  
15 Paragraph 72.

16 73. The allegations in Paragraph 73 state argument and conclusions of law to which no  
17 response is required. To the extent that the allegations in Paragraph 73 relate to parties other than  
18 the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
19 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
20 extent that the allegations in Paragraph 73 purport to be based on statutes, laws or regulations, those  
21 statutes, laws and regulations speak for themselves, and all characterizations thereof are denied. To  
22 the extent a response is required, the Actavis Generic Entities deny the remaining allegations in  
23 Paragraph 73.

24 74. The allegations in Paragraph 74 state argument and conclusions of law to which no  
25 response is required. To the extent that the allegations in Paragraph 74 relate to parties other than  
26 the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
27 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
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1 extent that the allegations in Paragraph 74 purport to be based on statutes, laws or regulations, those  
2 statutes, laws and regulations speak for themselves, and all characterizations thereof are denied. To  
3 the extent a response is required, the Actavis Generic Entities deny the remaining allegations in  
4 Paragraph 74.

5 75. The allegations in Paragraph 75 state argument and conclusions of law to which no  
6 response is required. To the extent that the allegations in Paragraph 75 relate to parties other than  
7 the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
8 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
9 extent that the allegations in Paragraph 75 purport to be based on statutes, laws or regulations, those  
10 statutes, laws and regulations speak for themselves, and all characterizations thereof are denied. To  
11 the extent a response is required, the Actavis Generic Entities deny the remaining allegations in  
12 Paragraph 75.

13 76. The allegations in Paragraph 76 state argument and conclusions of law to which no  
14 response is required. To the extent that allegations in Paragraph 76 relate to parties other than the  
15 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
16 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
17 extent that the allegations in Paragraph 76 purport to be based on statutes, laws or regulations, those  
18 statutes, laws and regulations speak for themselves, and all characterizations thereof are denied. To  
19 the extent a response is required, the Actavis Generic Entities deny the remaining allegations of  
20 Paragraph 76.

21 77. The Actavis Generic Entities do not dispute the assignment of this case to the San  
22 Francisco Division.

23 78. The Actavis Generic Entities admit that the City and County of San Francisco is one  
24 of the 58 counties in the State of California. The allegations in Paragraph 78 state argument and  
25 conclusions of law to which no response is required. To the extent that the allegations in Paragraph  
26 78 relate to parties other than the Actavis Generic Entities, the Actavis Generic Entities are without  
27 knowledge or information sufficient to form a belief as to the truth of those allegations and therefore  
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1 deny the same. To the extent that the allegations in Paragraph 78 purport to be based on statutes,  
2 laws or regulations, those statutes, laws and regulations speak for themselves, and all  
3 characterizations thereof are denied. To the extent a response is required, the Actavis Generic  
4 Entities deny the remaining allegations in Paragraph 78.

5 79. The allegations in Paragraph 79 state argument and conclusions of law to which no  
6 response is required. To the extent that the allegations in Paragraph 79 purport to be based on  
7 statutes, laws or regulations, those statutes, laws and regulations speak for themselves, and all  
8 characterizations thereof are denied. To the extent a response is required, the Actavis Generic  
9 Entities admit that Plaintiff seeks the relief listed in Paragraph 79, but deny that their conduct  
10 caused or contributed to Plaintiffs' alleged injuries and deny that they are liable to Plaintiffs for  
11 damages or any other relief sought in the Complaint.

12 80. The Actavis Generic Entities admit only that they have manufactured and sold  
13 certain generic prescription opioid medicines. The allegations in Paragraph 80 state argument and  
14 conclusions of law to which no response is required. To the extent that the allegations in Paragraph  
15 80 relate to parties other than the Actavis Generic Entities, the Actavis Generic Entities are without  
16 knowledge or information sufficient to form a belief as to the truth of those allegations and therefore  
17 deny the same. The Actavis Generic Entities deny the remaining allegations in Paragraph 80.

18 81. The allegations in Paragraph 81 are not directed to the Actavis Generic Entities and,  
19 thus, no response is required. To the extent a response is required, the Actavis Generic Entities are  
20 without knowledge or information sufficient to form a belief as to the truth of those allegations and  
21 therefore deny the same.

22 82. The allegations in Paragraph 82 are not directed to the Actavis Generic Entities and,  
23 thus, no response is required. To the extent a response is required, the Actavis Generic Entities are  
24 without knowledge or information sufficient to form a belief as to the truth of those allegations and  
25 therefore deny the same.

26 83. The allegations in Paragraph 83 are not directed to the Actavis Generic Entities and,  
27 thus, no response is required. To the extent a response is required, the Actavis Generic Entities are  
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1 without knowledge or information sufficient to form a belief as to the truth of those allegations and  
2 therefore deny the same.

3 84. The allegations in Paragraph 84 are not directed to the Actavis Generic Entities and,  
4 thus, no response is required. To the extent a response is required, the Actavis Generic Entities are  
5 without knowledge or information sufficient to form a belief as to the truth of those allegations and  
6 therefore deny the same.

7 85. The allegations in Paragraph 85 are not directed to the Actavis Generic Entities and,  
8 thus, no response is required. To the extent a response is required, the Actavis Generic Entities are  
9 without knowledge or information sufficient to form a belief as to the truth of those allegations and  
10 therefore deny the same.

11 86. The allegations in Paragraph 86 are not directed to the Actavis Generic Entities and,  
12 thus, no response is required. To the extent a response is required, the Actavis Generic Entities are  
13 without knowledge or information sufficient to form a belief as to the truth of those allegations and  
14 therefore deny the same.

15 87. The allegations in Paragraph 87 are not directed to the Actavis Generic Entities and,  
16 thus, no response is required. To the extent a response is required, the Actavis Generic Entities are  
17 without knowledge or information sufficient to form a belief as to the truth of those allegations and  
18 therefore deny the same.

19 88. The allegations in Paragraph 88 are not directed to the Actavis Generic Entities and,  
20 thus, no response is required. To the extent a response is required, the Actavis Generic Entities are  
21 without knowledge or information sufficient to form a belief as to the truth of those allegations and  
22 therefore deny the same.

23 89. The allegations in Paragraph 89 are not directed to the Actavis Generic Entities and,  
24 thus, no response is required. To the extent a response is required, the Actavis Generic Entities are  
25 without knowledge or information sufficient to form a belief as to the truth of those allegations and  
26 therefore deny the same.

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1           90.     The allegations in Paragraph 90 are not directed to the Actavis Generic Entities and,  
2 thus, no response is required. To the extent a response is required, the Actavis Generic Entities are  
3 without knowledge or information sufficient to form a belief as to the truth of those allegations and  
4 therefore deny the same.

5           91.     The allegations in Paragraph 91 are not directed to the Actavis Generic Entities and,  
6 thus, no response is required. To the extent a response is required, the Actavis Generic Entities are  
7 without knowledge or information sufficient to form a belief as to the truth of those allegations and  
8 therefore deny the same.

9           92.     The allegations in Paragraph 92 are not directed to the Actavis Generic Entities and,  
10 thus, no response is required. To the extent a response is required, the Actavis Generic Entities are  
11 without knowledge or information sufficient to form a belief as to the truth of those allegations and  
12 therefore deny the same.

13           93.     The allegations in Paragraph 93 are not directed to the Actavis Generic Entities and,  
14 thus, no response is required. To the extent a response is required, the Actavis Generic Entities are  
15 without knowledge or information sufficient to form a belief as to the truth of those allegations and  
16 therefore deny the same.

17           94.     The allegations in Paragraph 94 are not directed to the Actavis Generic Entities and,  
18 thus, no response is required. To the extent a response is required, the Actavis Generic Entities are  
19 without knowledge or information sufficient to form a belief as to the truth of those allegations and  
20 therefore deny the same.

21           95.     The allegations in Paragraph 95 are not directed to the Actavis Generic Entities and,  
22 thus, no response is required. To the extent a response is required, the Actavis Generic Entities are  
23 without knowledge or information sufficient to form a belief as to the truth of those allegations and  
24 therefore deny the same.

25           96.     The allegations in Paragraph 96 are not directed to the Actavis Generic Entities and,  
26 thus, no response is required. To the extent a response is required, the Actavis Generic Entities are  
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1 without knowledge or information sufficient to form a belief as to the truth of those allegations and  
2 therefore deny the same.

3 97. The allegations in Paragraph 97 are not directed to the Actavis Generic Entities and,  
4 thus, no response is required. To the extent a response is required, the Actavis Generic Entities are  
5 without knowledge or information sufficient to form a belief as to the truth of those allegations and  
6 therefore deny the same.

7 98. The allegations in Paragraph 98 are not directed to the Actavis Generic Entities and,  
8 thus, no response is required. To the extent a response is required, the Actavis Generic Entities are  
9 without knowledge or information sufficient to form a belief as to the truth of those allegations and  
10 therefore deny the same.

11 99. The allegations in Paragraph 99 are not directed to the Actavis Generic Entities and,  
12 thus, no response is required. To the extent a response is required, the Actavis Generic Entities are  
13 without knowledge or information sufficient to form a belief as to the truth of those allegations and  
14 therefore deny the same.

15 100. The allegations in Paragraph 100 are not directed to the Actavis Generic Entities  
16 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
17 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
18 and therefore deny the same.

19 101. The allegations in Paragraph 101 are not directed to the Actavis Generic Entities  
20 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
21 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
22 and therefore deny the same.

23 102. The allegations in Paragraph 102 are not directed to the Actavis Generic Entities  
24 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
25 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
26 and therefore deny the same.

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1           103. The allegations in Paragraph 103 are not directed to the Actavis Generic Entities  
2 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
3 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
4 and therefore deny the same.

5           104. The allegations in Paragraph 104 are not directed to the Actavis Generic Entities  
6 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
7 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
8 and therefore deny the same.

9           105. The allegations in Paragraph 105 are not directed to the Actavis Generic Entities  
10 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
11 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
12 and therefore deny the same.

13           106. The allegations in Paragraph 106 are not directed to the Actavis Generic Entities  
14 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
15 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
16 and therefore deny the same.

17           107. The allegations in Paragraph 107 are not directed to the Actavis Generic Entities  
18 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
19 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
20 and therefore deny the same.

21           108. The allegations in Paragraph 108 are not directed to the Actavis Generic Entities  
22 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
23 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
24 and therefore deny the same.

25           109. The allegations in Paragraph 109 are not directed to the Actavis Generic Entities  
26 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
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1 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
2 and therefore deny the same.

3 110. The allegations in Paragraph 110 are not directed to the Actavis Generic Entities  
4 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
5 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
6 and therefore deny the same.

7 111. The allegations in Paragraph 111 are not directed to the Actavis Generic Entities  
8 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
9 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
10 and therefore deny the same.

11 112. The allegations in Paragraph 112 are not directed to the Actavis Generic Entities  
12 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
13 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
14 and therefore deny the same.

15 113. The allegations in Paragraph 113 are not directed to the Actavis Generic Entities  
16 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
17 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
18 and therefore deny the same.

19 114. The allegations in Paragraph 114 are not directed to the Actavis Generic Entities  
20 and, thus, no response is required. To the extent a response is required, is the Actavis Generic  
21 Entities are without knowledge or information sufficient to form a belief as to the truth of those  
22 allegations and therefore deny the same.

23 115. The allegations in Paragraph 115 are not directed to the Actavis Generic Entities  
24 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
25 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
26 and therefore deny the same.

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1           116. The allegations in Paragraph 116 are not directed to the Actavis Generic Entities  
2 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
3 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
4 and therefore deny the same.

5           117. The allegations in Paragraph 117 are not directed to the Actavis Generic Entities  
6 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
7 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
8 and therefore deny the same.

9           118. The allegations in Paragraph 118 are not directed to the Actavis Generic Entities  
10 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
11 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
12 and therefore deny the same.

13           119. The allegations in Paragraph 119 are not directed to the Actavis Generic Entities  
14 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
15 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
16 and therefore deny the same.

17           120. The Actavis Generic Entities admit that Watson Laboratories, Inc. is a Nevada  
18 corporation. The Actavis Generic Entities deny that Allergan plc's generic business was sold to  
19 Teva Pharmaceutical Industries Ltd. The remaining allegations of Paragraph 120 are denied as  
20 stated. By way of clarification, the Actavis Generic Entities admit that Watson Laboratories, Inc.  
21 is a subsidiary of Actavis Holdco US, Inc., whose shares were acquired by Teva Pharmaceuticals  
22 USA, Inc., an indirect subsidiary of Teva Pharmaceutical Industries Ltd.

23           121. The Actavis Generic Entities admit that Warner Chilcott Company, LLC is a limited  
24 liability company incorporated in Puerto Rico. Warner Chilcott Company, LLC is now known as  
25 Teva Puerto Rico LLC. The Actavis Generic Entities admit that Warner Chilcott Company, LLC  
26 was a subsidiary of Warner Chilcott plc until Warner Chilcott plc became a wholly owned  
27 subsidiary of Allergan plc in 2013. By way of further clarification, the Actavis Generic Entities  
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1 admit that Warner Chilcott Company, LLC is an indirect subsidiary of Teva Pharmaceutical  
2 Industries Ltd.

3 122. The Actavis Generic Entities admit that Actavis Pharma, Inc. is a Delaware  
4 corporation with its principal place of business in New Jersey. The Actavis Generic Entities deny  
5 that Actavis Pharma, Inc. “was sold to Teva Pharmaceutical Industries Ltd.” The remaining  
6 allegations of Paragraph 122 are denied as stated. By way of clarification, the Actavis Generic  
7 Entities admit that Actavis Pharma Inc. is a subsidiary of Actavis Holdco US, Inc., whose shares  
8 were acquired by Teva Pharmaceuticals USA, Inc., an indirect subsidiary of Teva Pharmaceutical  
9 Industries Ltd., as part of Allergan plc’s 2016 sale of its generic business.

10 123. The Actavis Generic Entities admit that Actavis South Atlantic LLC is a Delaware  
11 limited liability company, but deny its principal place of business is Sunrise, Florida. The Actavis  
12 Generic Entities further admit that Actavis South Atlantic LLC was, at one time, listed as ANDA  
13 holder of oxymorphone and fentanyl transdermal. The Actavis Generic Entities deny as stated that  
14 Actavis South Atlantic LLC “was sold to Teva Pharmaceutical Industries Ltd.” By way of  
15 clarification, the Actavis Generic Entities admit that Actavis South Atlantic LLC is a subsidiary of  
16 Actavis Holdco US, Inc., whose shares were acquired by Teva USA, an indirect subsidiary of Teva  
17 Ltd., as part of Allergan plc’s 2016 sale of its generic businesses.

18 124. The Actavis Generic Entities admit that Actavis Elizabeth LLC is a Delaware  
19 limited liability company with its principal place of business in Elizabeth, New Jersey. The Actavis  
20 Generic Entities deny as stated that Actavis Elizabeth LLC “was sold to Teva Pharmaceutical  
21 Industries Ltd.” By way of clarification, the Actavis Generic Entities admit that Actavis Elizabeth  
22 LLC is a subsidiary of Actavis Holdco US, Inc., whose shares were acquired by Teva USA, an  
23 indirect subsidiary of Teva Ltd., as part of Allergan plc’s 2016 sale of its generic businesses. The  
24 Actavis Generic Entities admit the remaining allegations in Paragraph 124.

25 125. The Actavis Generic Entities admit that Actavis Mid Atlantic LLC is a Delaware  
26 limited liability company with its principal place of business in Parsippany, New Jersey. The  
27 Actavis Generic Entities deny as stated that Actavis Mid Atlantic LLC “was sold to Teva  
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1 Pharmaceutical Industries Ltd.” By way of clarification, the Actavis Generic Entities admit that  
2 Actavis Mid Atlantic LLC is a subsidiary of Actavis Holdco US, Inc., whose shares were acquired  
3 by Teva USA, an indirect subsidiary of Teva Ltd., as part of Allergan plc’s 2016 sale of its generic  
4 businesses. The Actavis Generic Entities admit the remaining allegations in Paragraph 125.

5 126. The Actavis Generic Entities admit that Actavis Totowa LLC is a Delaware limited  
6 liability company with its principal place of business in Parsippany, New Jersey. The Actavis  
7 Generic Entities admit the remaining allegations in Paragraph 126.

8 127. The Actavis Generic Entities admit that Actavis LLC is a Delaware limited liability  
9 company with its principal place of business in Parsippany, New Jersey. The Actavis Generic  
10 Entities are without sufficient information to form a belief as to the corporate structure of certain  
11 entities prior to Teva USA acquiring the shares of Actavis Holdco US, Inc. and therefore deny the  
12 allegations in Paragraph 127 related to same, including the allegation concerning Watson  
13 Laboratories, Inc.’s relationship to Actavis, Inc. The Actavis Generic Entities admit that Actavis  
14 South Atlantic LLC, Actavis Elizabeth LLC, Actavis Mid Atlantic LLC and Actavis Totowa LLC  
15 are direct subsidiaries of Actavis LLC. The Actavis Generic Entities deny as stated that Actavis  
16 LLC “was sold to Teva Pharmaceutical Industries Ltd.” By way of clarification, the Actavis  
17 Generic Entities admit that Actavis LLC is a subsidiary of Actavis Holdco US, Inc., whose shares  
18 were acquired by Teva USA, an indirect subsidiary of Teva Pharmaceutical Industries Ltd., as part  
19 of Allergan plc’s 2016 sale of its generic businesses.

20 128. The Actavis Generic Entities admit that Actavis Kadian LLC is a Delaware limited  
21 liability company. The Actavis Generic Entities deny as stated that Actavis Kadian LLC “was sold  
22 to Teva Pharmaceutical Industries Ltd.” By way of clarification, the Actavis Generic Entities admit  
23 that Actavis Kadian LLC is a subsidiary of Actavis Holdco US, Inc., whose shares were acquired  
24 by Teva USA, an indirect subsidiary of Teva Ltd., as part of Allergan plc’s 2016 sale of its generic  
25 businesses.

26 129. The Actavis Generic Entities deny the allegation in Paragraph 129 that Actavis  
27 Laboratories UT, Inc. (f/k/a Watson Laboratories, Inc.-Salt Lake City) is a limited liability  
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1 company. Actavis Laboratories UT, Inc. (f/k/a Watson Laboratories Inc.-Salt Lake City) is a  
2 Delaware corporation with its principal place of business in Salt Lake City, Utah. The Actavis  
3 Generic Entities deny as stated that Actavis Laboratories UT, Inc. “was sold to Teva Pharmaceutical  
4 Industries Limited.” By way of clarification, the Actavis Generic Entities admit that Actavis  
5 Laboratories UT, Inc. is a subsidiary of Actavis Holdco US, Inc., whose shares were acquired by  
6 Teva USA, an indirect subsidiary of Teva Ltd., as part of Allergan plc’s 2016 sale of its generic  
7 businesses.

8 130. The Actavis Generic Entities admit that Actavis Laboratories FL, Inc. is a Florida  
9 corporation with its principal place of business in Davie, Florida. The Actavis Generic Entities deny  
10 as stated that Actavis Laboratories FL, Inc. “was sold to Teva Pharmaceutical Industries Ltd.” By  
11 way of clarification, the Actavis Generic Entities admit that Actavis Laboratories FL, Inc. is a  
12 subsidiary of Actavis Holdco US, Inc., whose shares were acquired by Teva USA, an indirect  
13 subsidiary of Teva Ltd., as part of Allergan plc’s 2016 sale of its generic businesses. The Actavis  
14 Generic Entities are without sufficient information to form a belief as to the corporate structure of  
15 certain entities prior to Teva USA acquiring the shares of Actavis Holdco US, Inc. and therefore  
16 deny the allegations in Paragraph 130 related to same. The Actavis Generic Entities admit the  
17 remaining allegations in Paragraph 130.

18 131. The Actavis Generic Entities are without sufficient information to form a belief as  
19 to the corporate structure of certain entities prior to Teva USA acquiring the shares of Actavis  
20 Holdco US, Inc. and therefore deny the allegations in Paragraph 131 related to same, The Actavis  
21 Generic Entities object to Plaintiffs improperly grouping Allergan Finance, LLC, Allergan Sales,  
22 LLC, Allergan USA, Inc., Actavis Inc., Actavis LLC, Actavis Pharma, Inc., Watson  
23 Pharmaceuticals, Inc., Watson Pharma, Inc., Watson Laboratories, Inc., Warner Chilcott Company,  
24 LLC, Actavis South Atlantic LLC, Actavis Elizabeth LLC, Actavis Mid Atlantic LLC, Actavis  
25 Totowa LLC, Actavis Kadian, LLC, Actavis Laboratories UT, Inc. and Actavis Laboratories FL,  
26 Inc. as “Actavis”. The Actavis Generic Entities deny the remaining allegations in Paragraph 131.

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1           132. To the extent the allegations of Paragraph 132 are directed to parties other than the  
2 Actavis Generic Entities, no response is required and the Actavis Generic Entities are without  
3 knowledge or information sufficient to form a belief as to the truth of those allegations of Paragraph  
4 132 and therefore deny the same. The Actavis Generic Entities admit only that they have  
5 manufactured generic prescription opioids. The Actavis Generic Entities deny the remaining  
6 allegations of Paragraph 132.

7           133. The allegations in Paragraph 133 are not directed to the Actavis Generic Entities  
8 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
9 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
10 and therefore deny the same.

11           134. The allegations in Paragraph 134 are not directed to the Actavis Generic Entities  
12 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
13 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
14 and therefore deny the same.

15           135. The allegations in Paragraph 135 are not directed to the Actavis Generic Entities  
16 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
17 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
18 and therefore deny the same.

19           136. The allegations in Paragraph 136 are not directed to the Actavis Generic Entities  
20 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
21 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
22 and therefore deny the same.

23           137. The allegations in Paragraph 137 are not directed to the Actavis Generic Entities  
24 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
25 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
26 and therefore deny the same.

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1           138. The allegations in Paragraph 138 are not directed to the Actavis Generic Entities  
2 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
3 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
4 and therefore deny the same.

5           139. The allegations in Paragraph 139 are not directed to the Actavis Generic Entities  
6 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
7 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
8 and therefore deny the same.

9           140. The allegations in Paragraph 140 are not directed to the Actavis Generic Entities  
10 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
11 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
12 and therefore deny the same.

13           141. The allegations in Paragraph 141 are not directed to the Actavis Generic Entities  
14 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
15 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
16 and therefore deny the same.

17           142. The allegations in Paragraph 142 are not directed to the Actavis Generic Entities  
18 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
19 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
20 and therefore deny the same.

21           143. The allegations in Paragraph 143 are not directed to the Actavis Generic Entities  
22 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
23 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
24 and therefore deny the same.

25           144. The allegations in Paragraph 144 are not directed to the Actavis Generic Entities  
26 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
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1 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
2 and therefore deny the same.

3 145. The allegations in Paragraph 145 are not directed to the Actavis Generic Entities  
4 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
5 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
6 and therefore deny the same.

7 146. The allegations in Paragraph 146 are not directed to the Actavis Generic Entities  
8 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
9 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
10 and therefore deny the same.

11 147. The allegations in Paragraph 147 are not directed to the Actavis Generic Entities  
12 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
13 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
14 and therefore deny the same.

15 148. The allegations in Paragraph 148 are not directed to the Actavis Generic Entities  
16 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
17 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
18 and therefore deny the same.

19 149. The allegations in Paragraph 149 are not directed to the Actavis Generic Entities  
20 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
21 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
22 and therefore deny the same.

23 150. The allegations in Paragraph 150 are not directed to the Actavis Generic Entities  
24 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
25 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
26 and therefore deny the same.

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1           151. The allegations in Paragraph 151 are not directed to the Actavis Generic Entities  
2 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
3 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
4 and therefore deny the same.

5           152. The allegations in Paragraph 152 are not directed to the Actavis Generic Entities  
6 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
7 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
8 and therefore deny the same.

9           153. The allegations in Paragraph 153 are not directed to the Actavis Generic Entities  
10 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
11 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
12 and therefore deny the same.

13           154. The allegations in Paragraph 154 are not directed to the Actavis Generic Entities  
14 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
15 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
16 and therefore deny the same.

17           155. The allegations in Paragraph 155 are not directed to the Actavis Generic Entities  
18 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
19 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
20 and therefore deny the same.

21           156. The allegations in Paragraph 156 are not directed to the Actavis Generic Entities  
22 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
23 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
24 and therefore deny the same.

25           157. The allegations in Paragraph 157 are not directed to the Actavis Generic Entities  
26 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
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1 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
2 and therefore deny the same.

3 158. The allegations in Paragraph 158 are not directed to the Actavis Generic Entities  
4 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
5 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
6 and therefore deny the same.

7 159. The allegations in Paragraph 159 are not directed to the Actavis Generic Entities  
8 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
9 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
10 and therefore deny the same.

11 160. The allegations in Paragraph 160 are not directed to the Actavis Generic Entities  
12 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
13 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
14 and therefore deny the same.

15 161. The allegations in Paragraph 161 are not directed to the Actavis Generic Entities  
16 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
17 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
18 and therefore deny the same.

19 162. The allegations in Paragraph 162 are not directed to the Actavis Generic Entities  
20 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
21 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
22 and therefore deny the same.

23 163. The allegations in Paragraph 163 are not directed to the Actavis Generic Entities  
24 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
25 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
26 and therefore deny the same.

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1           164. The allegations in Paragraph 164 are not directed to the Actavis Generic Entities  
2 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
3 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
4 and therefore deny the same.

5           165. The Actavis Generic Entities objects to Plaintiffs improperly grouping “Purdue,  
6 Actavis, Cephalon, Janssen, Endo, Insys, Mallinckrodt and the Sackler Defendants” as “Marketing  
7 Defendants.”

8           166. The allegations in Paragraph 166 are not directed to the Actavis Generic Entities  
9 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
10 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
11 and therefore deny the same.

12           167. The allegations in Paragraph 167 are not directed to the Actavis Generic Entities  
13 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
14 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
15 and therefore deny the same.

16           168. The allegations in Paragraph 168 are not directed to the Actavis Generic Entities  
17 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
18 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
19 and therefore deny the same.

20           169. The allegations in Paragraph 169 are not directed to the Actavis Generic Entities  
21 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
22 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
23 and therefore deny the same.

24           171. The allegations in Paragraph 170 are not directed to the Actavis Generic Entities  
25 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
26 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
27 and therefore deny the same.

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1           172. The allegations in Paragraph 171 are not directed to the Actavis Generic Entities  
2 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
3 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
4 and therefore deny the same.

5           172. The allegations in Paragraph 172 are not directed to the Actavis Generic Entities  
6 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
7 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
8 and therefore deny the same.

9           173. The allegations in Paragraph 173 are not directed to the Actavis Generic Entities  
10 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
11 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
12 and therefore deny the same.

13           174. The allegations in Paragraph 174 state argument and conclusions of law to which  
14 no response is required. To the extent that the allegations in Paragraph 174 relate to parties other  
15 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
16 information sufficient to form a belief as to the truth of the allegations in Paragraph 174 and  
17 therefore deny the same. To the extent a response is required, the Actavis Generic Entities deny  
18 the allegations in Paragraph 174.

19           175. The Actavis Generic Entities admit that opioids bind to receptors in the brain,  
20 include natural, synthetic, and semi-synthetic opioids, and can produce multiple effects on the  
21 human body. The Actavis Generic Entities further admit that prescription opioids can be written  
22 for and used by patients to treat pain when lawfully prescribed. The Actavis Generic Entities  
23 further admit that the indications and known risks related to The Actavis Generic Entities' opioids  
24 products are disclosed and addressed in the FDA-approved FPI as required by the FDA. Those  
25 FPIs are documents that speak for themselves, and any characterizations that are different than or  
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1 inconsistent with the FPIs are denied. The Actavis Generic Entities deny the remaining allegations  
2 in Paragraph 175.

3 176. The Actavis Generic Entities admit that the “potential for abuse and addiction” of  
4 opioids have long been recognized. The remaining allegations are the subject of expert testimony  
5 and The Actavis Generic Entities are without knowledge or information sufficient to form a belief  
6 as to the truth of the allegations of Paragraph 176 and therefore deny the same.

7 177. The Actavis Generic Entities are without knowledge or information sufficient to  
8 form a belief as to the truth of the allegations of Paragraph 177 and therefore deny the same. Further,  
9 to the extent that the allegations in Paragraph 177 purport to be based on documents, including  
10 those referred to in footnote 66, those documents speak for themselves, and all characterizations  
11 thereof are denied.

12 178. The Actavis Generic Entities are without knowledge or information sufficient to  
13 form a belief as to the truth of the allegations of Paragraph 178 and therefore deny the same.

14 179. The Actavis Generic Entities deny that there is “little difference between [the illicit  
15 drugs heroin and opium] and prescription opioids.” The Actavis Generic Entities admit that  
16 prescription opioids are narcotics that bind to receptors in the brain and body. The Actavis Generic  
17 Entities are without knowledge or information sufficient to form a belief as to the truth of the  
18 remaining allegations of Paragraph 179 and therefore deny the same.

19 180. The Actavis Generic Entities admit that some prescription opioids have been  
20 regulated “as Schedule II controlled substances by the U.S. Drug Enforcement Administration  
21 (“DEA”) since 1970.” The Actavis Generic Entities are without knowledge or information  
22 sufficient to form a belief as to the truth of remaining allegations of Paragraph 180 and therefore  
23 deny the same.

24 181. The Actavis Generic Entities admit that Percodan, Percocet, and Vicodin are  
25 prescription opioids. The Actavis Generic Entities are without knowledge or information sufficient  
26 to form a belief as to the truth of the remaining allegations of Paragraph 181 and therefore deny the  
27 same.  
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1           182. The allegations in Paragraph 182 are not directed to the Actavis Generic Entities  
2 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
3 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
4 and therefore deny the same.

5           183. To the extent that the allegations in Paragraph 183 purport to be based on  
6 documents, those documents speak for themselves, and all characterizations thereof are denied. The  
7 Actavis Generic Entities are without knowledge or information sufficient to form a belief as to the  
8 truth of the allegations of Paragraph 183 and therefore deny the same.

9           184. To the extent that the allegations in Paragraph 184 relate to parties other than the  
10 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
11 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
12 extent that the allegations in Paragraph 184 purport to be based on documents, those documents  
13 speak for themselves, and all characterizations thereof are denied. The Actavis Generic Entities  
14 are without knowledge or information sufficient to form a belief as to the truth of the remaining  
15 allegations and therefore deny the same.

16           185. The allegations in Paragraph 185 state argument and conclusions of law to which  
17 no response is required. To the extent that the allegations in Paragraph 185 relate to parties other  
18 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
19 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
20 same. To the extent a response is required, the Actavis Generic Entities deny the allegations in  
21 Paragraph 185.

22           186. The Actavis Generic Entities admit that fentanyl is a synthetic opioid. To the extent  
23 that the allegations in Paragraph 186 relate to parties other than the Actavis Generic Entities, the  
24 Actavis Generic Entities are without knowledge or information sufficient to form a belief as to the  
25 truth of those allegations and therefore deny the same. The Actavis Generic Entities deny the  
26 remaining allegations in Paragraph 186.

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1           187. The Actavis Generic Entities admit that the indications and known risks related to  
2 its opioids products are disclosed and addressed in the FDA-approved FPI as required and approved  
3 by the FDA. Those FPIs are documents that speak for themselves, and any characterizations that  
4 are different than or inconsistent with the FPIs are denied. To the extent that allegations in  
5 Paragraph 187 purport to be based on a document, that document speaks for itself, and all  
6 characterizations thereof are denied. The Actavis Generic Entities deny the remaining allegations  
7 of Paragraph 187.

8           188. The Actavis Generic Entities admit that tolerance can occur in certain patient  
9 populations and that it is a known risk that is disclosed and addressed in the FPIs of their opioid  
10 products, as required and approved by the FDA. The Actavis Generic Entities further admit that  
11 opioids can depress respiration and respiratory depression can occur even when opioids are taken  
12 as recommended and that is a known risk that is disclosed and addressed in the FPIs of its opioids  
13 products, as required and approved by the FDA. Those FPIs are documents that speak for  
14 themselves, and any characterizations that are different than or inconsistent with the FPIs are  
15 denied. To the extent that allegations in Paragraph 188 purport to be based on a document, that  
16 document speaks for itself, and all characterizations thereof are denied. The Actavis Generic  
17 Entities deny the remaining allegations of Paragraph 188.

18           189. The Actavis Generic Entities admit that tolerance can occur in certain patient  
19 populations and that it is a known risk that is disclosed and addressed in the FPIs of their opioid  
20 products, as required and approved by the FDA. The Actavis Generic Entities further admit that  
21 opioids can depress respiration and respiratory depression can occur even when opioids are taken  
22 as recommended and that is a known risk that is disclosed and addressed in the FPIs of its opioids  
23 products, as required and approved by the FDA. Those FPIs are documents that speak for  
24 themselves, and any characterizations that are different than or inconsistent with the FPIs are  
25 denied. To the extent that allegations in Paragraph 189 purport to be based on a document, that  
26 document speaks for itself, and all characterizations thereof are denied. The Actavis Generic  
27 Entities deny the remaining allegations of Paragraph 189.

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1           190. To the extent that the allegations in Paragraph 190 purport to be based on  
2 documents, those documents speak for themselves, and all characterizations thereof are denied. The  
3 Actavis Generic Entities deny the remaining allegations of Paragraph 190.

4           191. To the extent that the allegations in Paragraph 191 relate to parties other than the  
5 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
6 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
7 Actavis Generic Entities deny the remaining allegations in Paragraph 191.

8           192. The allegations in Paragraph 192 are not directed to the Actavis Generic Entities  
9 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
10 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
11 and therefore deny the same.

12           193. The allegations in Paragraph 193 are not directed to the Actavis Generic Entities  
13 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
14 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
15 and therefore deny the same.

16           194. The allegations in Paragraph 194 are not directed to the Actavis Generic Entities  
17 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
18 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
19 and therefore deny the same.

20           195. The allegations in Paragraph 195 are not directed to the Actavis Generic Entities  
21 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
22 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
23 and therefore deny the same.

24           196. To the extent that the allegations in Paragraph 196 relate to parties other than the  
25 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
26 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
27 Actavis Generic Entities deny the remaining allegations in Paragraph 196.

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1           197. The allegations in Paragraph 197 are not directed to the Actavis Generic Entities  
2 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
3 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
4 and therefore deny the same.

5           198. The allegations in Paragraph 198 are not directed to the Actavis Generic Entities  
6 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
7 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
8 and therefore deny the same.

9           199. The allegations in Paragraph 199 are not directed to the Actavis Generic Entities  
10 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
11 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
12 and therefore deny the same.

13           200. The allegations in Paragraph 200 are not directed to the Actavis Generic Entities  
14 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
15 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
16 and therefore deny the same.

17           201. The allegations in Paragraph 201 are not directed to the Actavis Generic Entities  
18 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
19 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
20 and therefore deny the same.

21           202. The allegations in Paragraph 202 are not directed to the Actavis Generic Entities  
22 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
23 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
24 and therefore deny the same.

25           203. The allegations in Paragraph 203 are not directed to the Actavis Generic Entities  
26 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
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1 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
2 and therefore deny the same.

3 204. The allegations in Paragraph 204 are not directed to the Actavis Generic Entities  
4 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
5 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
6 and therefore deny the same.

7 205. The allegations in Paragraph 205 are not directed to the Actavis Generic Entities  
8 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
9 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
10 and therefore deny the same.

11 206. The allegations in Paragraph 206 are not directed to the Actavis Generic Entities  
12 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
13 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
14 and therefore deny the same.

15 207. The allegations in Paragraph 207 are not directed to the Actavis Generic Entities  
16 and, thus, no response is required. To the extent a response is required, is the Actavis Generic  
17 Entities are without knowledge or information sufficient to form a belief as to the truth of those  
18 allegations and therefore deny the same.

19 208. The allegations in Paragraph 208 are not directed to the Actavis Generic Entities  
20 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
21 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
22 and therefore deny the same.

23 209. The allegations in Paragraph 209 are not directed to the Actavis Generic Entities  
24 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
25 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
26 and therefore deny the same.

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1           210. The allegations in Paragraph 210 are not directed to the Actavis Generic Entities  
2 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
3 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
4 and therefore deny the same.

5           211. The allegations in Paragraph 211 are not directed to the Actavis Generic Entities  
6 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
7 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
8 and therefore deny the same.

9           212. The allegations in Paragraph 212 are not directed to the Actavis Generic Entities  
10 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
11 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
12 and therefore deny the same.

13           213. The allegations in Paragraph 213 are not directed to the Actavis Generic Entities  
14 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
15 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
16 and therefore deny the same.

17           214. To the extent that the allegations in Paragraph 214 relate to parties other than the  
18 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
19 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
20 Actavis Generic Entities deny the remaining allegations in Paragraph 214.

21           215. The allegations in Paragraph 215 are not directed to the Actavis Generic Entities  
22 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
23 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
24 and therefore deny the same.

25           216. The allegations in Paragraph 216 are not directed to the Actavis Generic Entities  
26 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
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1 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
2 and therefore deny the same.

3 217. The allegations in Paragraph 217 are not directed to the Actavis Generic Entities  
4 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
5 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
6 and therefore deny the same.

7 218. The allegations in Paragraph 218 are not directed to the Actavis Generic Entities  
8 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
9 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
10 and therefore deny the same.

11 219. The allegations in Paragraph 219 are not directed to the Actavis Generic Entities  
12 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
13 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
14 and therefore deny the same.

15 220. The allegations in Paragraph 220 are not directed to the Actavis Generic Entities  
16 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
17 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
18 and therefore deny the same.

19 221. To the extent that the allegations in Paragraph 221 relate to parties other than the  
20 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
21 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
22 Actavis Generic Entities deny the remaining allegations in Paragraph 221.

23 222. The allegations in Paragraph 222 state argument and conclusions of law to which  
24 no response is required. To the extent that the allegations in Paragraph 222 relate to parties other  
25 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
26 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
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1 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
2 allegations in Paragraph 222.

3 223. The allegations in Paragraph 223 state argument and conclusions of law to which  
4 no response is required. To the extent that the allegations in Paragraph 223 relate to parties other  
5 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
6 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
7 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
8 allegations in Paragraph 223.

9 224. The allegations in Paragraph 224 state argument and conclusions of law to which  
10 no response is required. To the extent that the allegations in Paragraph 224 relate to parties other  
11 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
12 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
13 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
14 allegations in Paragraph 224.

15 225. The allegations in Paragraph 225 state argument and conclusions of law to which  
16 no response is required. To the extent that the allegations in Paragraph 225 relate to parties other  
17 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
18 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
19 same. The Actavis Generic Entities deny the remaining allegations in Paragraph 225.

20 226. The allegations in Paragraph 226 state argument and conclusions of law to which  
21 no response is required. To the extent that the allegations in Paragraph 226 relate to parties other  
22 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
23 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
24 same. To the extent that the allegations in Paragraph 226 purport to be based on documents, those  
25 documents speak for themselves, and all characterizations thereof are denied. The Actavis Generic  
26 Entities deny the remaining allegations in Paragraph 226.

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1           227. The allegations in Paragraph 227 state argument and conclusions of law to which  
2 no response is required. To the extent that the allegations in Paragraph 227 relate to parties other  
3 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
4 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
5 same. The Actavis Generic Entities deny the remaining allegations in Paragraph 227.

6           228. To the extent that the allegations in Paragraph 228 relate to parties other than the  
7 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
8 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
9 Actavis Generic Entities deny the remaining allegations in Paragraph 228.

10           229. The allegations in Paragraph 229 state argument and conclusions of law to which  
11 no response is required. To the extent that the allegations in Paragraph 229 relate to parties other  
12 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
13 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
14 same. The Actavis Generic Entities deny the remaining allegations in Paragraph 229.

15           230. The allegations in Paragraph 230 state argument and conclusions of law to which  
16 no response is required. To the extent that the allegations in Paragraph 230 relate to parties other  
17 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
18 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
19 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
20 allegations in Paragraph 230.

21           231. The allegations in Paragraph 231 state argument and conclusions of law to which  
22 no response is required. To the extent that the allegations in Paragraph 231 relate to parties other  
23 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
24 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
25 same. The Actavis Generic Entities deny the remaining allegations in Paragraph 231.

26           232. To the extent that the allegations in Paragraph 232 relate to parties other than the  
27 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
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1 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
2 Actavis Generic Entities deny the remaining allegations in Paragraph 232.

3 233. To the extent that the allegations in Paragraph 233 relate to parties other than the  
4 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
5 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
6 extent that the allegations in Paragraph 233 purport to be based on documents, those documents  
7 speak for themselves, and all characterizations thereof are denied. The Actavis Generic Entities  
8 deny the remaining allegations in Paragraph 233.

9 234. To the extent that Paragraph 234 purports to be based on documents, those  
10 documents speak for themselves, and all characterizations thereof are denied. To the extent a  
11 response is required, the Actavis Generic Entities are without knowledge or information sufficient  
12 to form a belief as to the truth of the allegations and therefore deny the same.

13 235. To the extent that Paragraph 235 purports to be based on a document, including the  
14 document referred to in footnote 85, that document speaks for itself, and all characterizations  
15 thereof are denied. To the extent a response is required, the Actavis Generic Entities are without  
16 knowledge or information sufficient to form a belief as to the truth of the remaining allegations and  
17 therefore deny the same.

18 236. To the extent the allegations in Paragraph 236 relate to parties other than the Actavis  
19 Generic Entities, the Actavis Generic Entities are without knowledge or information sufficient to  
20 form a belief as to the truth of those allegations and therefore deny the same. To the extent that  
21 Paragraph 236 purports to be based on a document, including the document referred to in footnote  
22 86, that document speaks for itself, and all characterizations thereof are denied. To the extent a  
23 response is required, the Actavis Generic Entities are without knowledge or information sufficient  
24 to form a belief as to the truth of the remaining allegations and therefore deny the same.

25 237. The allegations in Paragraph 237 are not directed to the Actavis Generic Entities  
26 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
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1 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
2 and therefore deny the same.

3 238. The allegations in Paragraph 238 are not directed to the Actavis Generic Entities  
4 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
5 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
6 and therefore deny the same.

7 239. To the extent that the allegations in Paragraph 239 relate to parties other than the  
8 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
9 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
10 extent that the allegations in Paragraph 239 purport to be based on documents, including those  
11 referred to in footnote 90, those documents speak for themselves, and all characterizations thereof  
12 are denied. The Actavis Generic Entities deny the remaining allegations in Paragraph 239.

13 240. To the extent that the allegations in Paragraph 240 relate to parties other than the  
14 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
15 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
16 extent that the allegations in Paragraph 240 purport to be based on documents, including those  
17 referred to in footnote 91, those documents speak for themselves, and all characterizations thereof  
18 are denied. The Actavis Generic Entities deny the remaining allegations in Paragraph 240.

19 241. The allegations in Paragraph 241 are not directed to the Actavis Generic Entities  
20 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
21 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
22 and therefore deny the same.

23 242. The allegations in Paragraph 242 are not directed to the Actavis Generic Entities  
24 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
25 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
26 and therefore deny the same.

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1           243. The allegations in Paragraph 243 are not directed to the Actavis Generic Entities  
2 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
3 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
4 and therefore deny the same.

5           244. The allegations in Paragraph 244 are not directed to the Actavis Generic Entities  
6 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
7 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
8 and therefore deny the same.

9           245. The allegations in Paragraph 245 are not directed to the Actavis Generic Entities  
10 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
11 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
12 and therefore deny the same.

13           246. The allegations in Paragraph 246 are not directed to the Actavis Generic Entities  
14 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
15 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
16 and therefore deny the same.

17           247. The allegations in Paragraph 247 are not directed to the Actavis Generic Entities  
18 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
19 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
20 and therefore deny the same.

21           248. The allegations in Paragraph 248 are not directed to the Actavis Generic Entities  
22 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
23 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
24 and therefore deny the same.

25           249. The allegations in Paragraph 249 are not directed to the Actavis Generic Entities  
26 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
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1 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
2 and therefore deny the same.

3 250. The allegations in Paragraph 250 are not directed to the Actavis Generic Entities  
4 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
5 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
6 and therefore deny the same.

7 251. The allegations in Paragraph 251 are not directed to the Actavis Generic Entities  
8 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
9 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
10 and therefore deny the same.

11 252. The allegations in Paragraph 252 are not directed to the Actavis Generic Entities  
12 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
13 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
14 and therefore deny the same.

15 253. The allegations in Paragraph 253 are not directed to the Actavis Generic Entities  
16 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
17 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
18 and therefore deny the same.

19 254. The allegations in Paragraph 254 are not directed to the Actavis Generic Entities  
20 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
21 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
22 and therefore deny the same.

23 255. The allegations in Paragraph 255 are not directed to the Actavis Generic Entities  
24 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
25 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
26 and therefore deny the same.

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1           256. The allegations in Paragraph 256 are not directed to the Actavis Generic Entities  
2 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
3 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
4 and therefore deny the same.

5           257. The allegations in Paragraph 257 are not directed to the Actavis Generic Entities  
6 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
7 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
8 and therefore deny the same.

9           258. The allegations in Paragraph 258 are not directed to the Actavis Generic Entities  
10 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
11 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
12 and therefore deny the same.

13           259. The allegations in Paragraph 259 are not directed to the Actavis Generic Entities  
14 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
15 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
16 and therefore deny the same.

17           260. The allegations in Paragraph 260 are not directed to the Actavis Generic Entities  
18 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
19 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
20 and therefore deny the same.

21           261. The allegations in Paragraph 261 are not directed to the Actavis Generic Entities  
22 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
23 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
24 and therefore deny the same.

25           262. The allegations in Paragraph 262 are not directed to the Actavis Generic Entities  
26 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
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1 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
2 and therefore deny the same.

3 263. The allegations in Paragraph 263 are not directed to the Actavis Generic Entities  
4 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
5 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
6 and therefore deny the same.

7 264. The allegations in Paragraph 264 are not directed to the Actavis Generic Entities  
8 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
9 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
10 and therefore deny the same.

11 265. The allegations in Paragraph 265 are not directed to the Actavis Generic Entities  
12 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
13 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
14 and therefore deny the same.

15 266. The allegations in Paragraph 266 are not directed to the Actavis Generic Entities  
16 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
17 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
18 and therefore deny the same.

19 267. The allegations in Paragraph 267 are not directed to the Actavis Generic Entities  
20 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
21 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
22 and therefore deny the same.

23 268. The allegations in Paragraph 268 are not directed to the Actavis Generic Entities  
24 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
25 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
26 and therefore deny the same.

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1           269. The allegations in Paragraph 269 are not directed to the Actavis Generic Entities  
2 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
3 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
4 and therefore deny the same.

5           270. The allegations in Paragraph 270 are not directed to the Actavis Generic Entities  
6 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
7 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
8 and therefore deny the same.

9           271. The allegations in Paragraph 271 are not directed to the Actavis Generic Entities  
10 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
11 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
12 and therefore deny the same.

13           272. The allegations in Paragraph 272 are not directed to the Actavis Generic Entities  
14 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
15 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
16 and therefore deny the same.

17           273. The allegations in Paragraph 273 are not directed to the Actavis Generic  
18 Entities and, thus, no response is required. To the extent a response is required, the Actavis Generic  
19 Entities are without knowledge or information sufficient to form a belief as to the truth of those  
20 allegations and therefore deny the same.

21           274. The allegations in Paragraph 274 are based on documents that speak for themselves  
22 and all characterizations thereof are denied. The Actavis Generic Entities are without knowledge  
23 or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph  
24 274 and therefore deny the same.

25           275. The allegations in Paragraph 275 are not directed to the Actavis Generic Entities  
26 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
27 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
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1 and therefore deny the same. To the extent that the allegations in Paragraph 275 purport to be based  
2 on documents, those documents speak for themselves and all characterizations are denied.

3 276. The allegations in Paragraph 276 are not directed to the Actavis Generic Entities  
4 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
5 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
6 and therefore deny the same.

7 277. The allegations in Paragraph 277 are not directed to the Actavis Generic Entities  
8 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
9 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
10 and therefore deny the same.

11 278. The allegations in Paragraph 278 are not directed to the Actavis Generic Entities  
12 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
13 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
14 and therefore deny the same.

15 279. The allegations in Paragraph 279 are not directed to the Actavis Generic Entities  
16 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
17 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
18 and therefore deny the same.

19 280. The allegations in Paragraph 280 are not directed to the Actavis Generic Entities  
20 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
21 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
22 and therefore deny the same.

23 281. The allegations in Paragraph 281 are not directed to the Actavis Generic Entities  
24 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
25 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
26 and therefore deny the same.

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1           282. The allegations in Paragraph 282 are not directed to the Actavis Generic Entities  
2 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
3 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
4 and therefore deny the same.

5           283. To the extent that the allegations in Paragraph 283 relate to parties other than the  
6 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
7 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
8 Actavis Generic Entities deny the remaining allegations in Paragraph 283.

9           284. To the extent that the allegations in Paragraph 284 relate to parties other than the  
10 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
11 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
12 Actavis Generic Entities deny the remaining allegations in Paragraph 284.

13           285. The allegations in Paragraph 285 are not directed to the Actavis Generic Entities  
14 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
15 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
16 and therefore deny the same.

17           286. The allegations in Paragraph 286 are not directed to the Actavis Generic Entities  
18 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
19 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
20 and therefore deny the same.

21           287. The allegations in Paragraph 287 are not directed to the Actavis Generic Entities  
22 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
23 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
24 and therefore deny the same.

25           288. The allegations in Paragraph 288 are not directed to the Actavis Generic Entities  
26 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
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1 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
2 and therefore deny the same.

3 289. The allegations in Paragraph 289 are not directed to the Actavis Generic Entities  
4 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
5 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
6 and therefore deny the same.

7 290. The allegations in Paragraph 290 are not directed to the Actavis Generic Entities  
8 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
9 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
10 and therefore deny the same.

11 291. To the extent that the allegations in Paragraph 291 relate to parties other than the  
12 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
13 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
14 Actavis Generic Entities deny the remaining allegations of Paragraph 291.

15 292. To the extent that the allegations in Paragraph 292 relate to parties other than the  
16 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
17 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
18 extent that the allegations in Paragraph 292 purport to be based on documents, including those  
19 referred to in footnote 104, those documents speak for themselves, and all characterizations thereof  
20 are denied. The Actavis Generic Entities deny the remaining allegations in Paragraph 292.

21 293. To the extent that the allegations in Paragraph 293 relate to parties other than the  
22 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
23 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
24 extent that the allegations in Paragraph 293 purport to be based on documents, including those  
25 referred to in footnote 104, those documents speak for themselves, and all characterizations thereof  
26 are denied. The Actavis Generic Entities deny the remaining allegations in Paragraph 293.

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1           294. The allegations in Paragraph 294 are not directed to the Actavis Generic Entities  
2 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
3 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
4 and therefore deny the same.

5           295. The allegations in Paragraph 295 are not directed to the Actavis Generic Entities  
6 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
7 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
8 and therefore deny the same.

9           296. The allegations in Paragraph 296 are not directed to the Actavis Generic Entities  
10 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
11 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
12 and therefore deny the same.

13           297. The allegations in Paragraph 297 are not directed to the Actavis Generic Entities  
14 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
15 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
16 and therefore deny the same.

17           298. The allegations in Paragraph 298 are not directed to the Actavis Generic Entities  
18 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
19 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
20 and therefore deny the same.

21           299. The allegations in Paragraph 299 are not directed to the Actavis Generic Entities  
22 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
23 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
24 and therefore deny the same.

25           300. The allegations in Paragraph 300 are not directed to the Actavis Generic Entities  
26 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
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1 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
2 and therefore deny the same.

3 301. The allegations in Paragraph 301 are not directed to the Actavis Generic Entities  
4 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
5 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
6 and therefore deny the same.

7 302. To the extent that the allegations in Paragraph 302 relate to parties other than the  
8 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
9 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
10 extent that the allegations in Paragraph 302 purport to be based on documents and/or quotes, those  
11 documents and/or quotes speak for themselves, and all characterizations thereof are denied. The  
12 Actavis Generic Entities are without knowledge or information sufficient to form a belief as to the  
13 truth of the remaining allegations of Paragraph 302 and therefore deny the same.

14 303. The Actavis Generic Entities admit that known risks related to its opioid products  
15 are disclosed and addressed in the FPIs, as required and approved by the FDA. Those FPIs are  
16 documents that speak for themselves, for those products, and any characterizations that are different  
17 than or inconsistent with the FPIs are denied. To the extent that the allegations in Paragraph 303  
18 relate to parties other than the Actavis Generic Entities, the Actavis Generic Entities are without  
19 knowledge or information sufficient to form a belief as to the truth of those allegations and therefore  
20 deny the same. The Actavis Generic Entities deny the remaining allegations of Paragraph 303.

21 304. The allegations in Paragraph 304 are not directed to the Actavis Generic Entities  
22 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
23 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
24 and therefore deny the same.

25 305. The allegations in Paragraph 305 are not directed to the Actavis Generic Entities  
26 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
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1 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
2 and therefore deny the same.

3 306. To the extent that the allegations in Paragraph 306 relate to parties other than the  
4 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
5 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
6 Actavis Generic Entities deny the remaining allegations in Paragraph 306.

7 307. The Actavis Generic Entities admit the known risks related to its opioid products  
8 are disclosed in the FPIs as required and approved by the FDA. Those FPIs are documents that  
9 speak for themselves, for those products, and any characterizations that are different than or  
10 inconsistent with the FPIs are denied. To the extent that the allegations in Paragraph 307 relate to  
11 parties other than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge  
12 or information sufficient to form a belief as to the truth of those allegations and therefore deny the  
13 same. To the extent that the allegations in Paragraph 307 purport to be based on documents, those  
14 documents speak for themselves, and all characterizations thereof are denied. The Actavis Generic  
15 Entities deny the remaining allegations in Paragraph 307.

16 308. The Actavis Generic Entities deny the allegations in Paragraph 308.

17 309. The allegations in Paragraph 309 are not directed to the Actavis Generic Entities  
18 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
19 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
20 and therefore deny the same.

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22 310. The allegations in Paragraph 310 are not directed to the Actavis Generic Entities  
23 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
24 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
25 and therefore deny the same.

26 311. To the extent that the allegations in Paragraph 311 relate to parties other than the  
27 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information

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1 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
2 Actavis Generic Entities deny the allegations in Paragraph 311.

3 312. The allegations in Paragraph 312 are not directed to the Actavis Generic Entities  
4 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
5 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
6 and therefore deny the same.

7 313. The allegations in Paragraph 313 are not directed to the Actavis Generic Entities  
8 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
9 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
10 and therefore deny the same.

11 314. The allegations in Paragraph 314 are not directed to the Actavis Generic Entities  
12 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
13 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
14 and therefore deny the same.

15 315. The allegations in Paragraph 315 are not directed to the Actavis Generic Entities  
16 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
17 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
18 and therefore deny the same.

19 316. The allegations in Paragraph 316 are not directed to the Actavis Generic Entities  
20 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
21 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
22 and therefore deny the same.

23 317. The allegations in Paragraph 317 are not directed to the Actavis Generic Entities  
24 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
25 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
26 and therefore deny the same.

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1           318. To the extent that the allegations in Paragraph 318 relate to parties other than the  
2 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
3 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
4 extent that the allegations in Paragraph 318 purport to be based on documents, those documents  
5 speak for themselves, and all characterizations thereof are denied. The Actavis Generic Entities  
6 deny the remaining allegations in Paragraph 318.

7           319. To the extent that the allegations in Paragraph 319 relate to parties other than the  
8 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
9 sufficient to form a belief as to the truth of the allegations and therefore deny the same. The Actavis  
10 Generic Entities deny the remaining allegations in Paragraph 319.

11           320. The allegations in Paragraph 320 are not directed to the Actavis Generic Entities  
12 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
13 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
14 and therefore deny the same.

15           321. The allegations in Paragraph 321 are not directed to the Actavis Generic Entities  
16 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
17 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
18 and therefore deny the same.

19           322. The allegations in Paragraph 322 are not directed to the Actavis Generic Entities  
20 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
21 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
22 and therefore deny the same.

23           323. The allegations in Paragraph 323 are not directed to the Actavis Generic Entities  
24 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
25 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
26 and therefore deny the same.

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1           324. The allegations in Paragraph 324 are not directed to the Actavis Generic Entities  
2 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
3 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
4 and therefore deny the same.

5           325. The allegations in Paragraph 325 are not directed to the Actavis Generic Entities  
6 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
7 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
8 and therefore deny the same.

9           326. The allegations in Paragraph 326 are not directed to the Actavis Generic Entities  
10 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
11 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
12 and therefore deny the same.

13           327. The allegations in Paragraph 327 are not directed to the Actavis Generic Entities  
14 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
15 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
16 and therefore deny the same.

17           328. The allegations in Paragraph 328 are not directed to the Actavis Generic Entities  
18 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
19 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
20 and therefore deny the same.

21           329. The allegations in Paragraph 329 are not directed to the Actavis Generic Entities  
22 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
23 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
24 and therefore deny the same.

25           330. The allegations in Paragraph 330 are not directed to the Actavis Generic Entities  
26 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
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1 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
2 and therefore deny the same.

3 331. The allegations in Paragraph 331 are not directed to the Actavis Generic Entities  
4 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
5 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
6 and therefore deny the same.

7 332. To the extent that the allegations in Paragraph 332 relate to parties other than the  
8 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
9 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
10 extent that the allegations in Paragraph 332 purport to be based on documents, including those  
11 referred to in footnotes 112 and 113, those documents speak for themselves, and all  
12 characterizations thereof are denied. The Actavis Generic Entities deny the remaining allegations  
13 in Paragraph 332.

14 333. To the extent that the allegations in Paragraph 333 purport to be based on  
15 documents, including thoses referred to in footnote 114, those documents speak for themselves,  
16 and all characterizations thereof are denied. The Actavis Generic Entities are without knowledge  
17 or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph  
18 333 and therefore deny the same.

19 334. To the extent that the allegations in Paragraph 334 purport to be based on documents  
20 and/or quotes, including those referred to in footnotes 115 and 116, those documents and/or quotes  
21 speak for themselves, and all characterizations thereof are denied. The Actavis Generic Entities  
22 are without knowledge or information sufficient to form a belief as to the truth of the remaining  
23 allegations of Paragraph 334 and therefore deny the same.

24 335. To the extent that the allegations in Paragraph 335 purport to be based on documents  
25 and/or quotes, including those referred to in footnotes 117, 118 and 119, those documents and/or  
26 quotes speak for themselves, and all characterizations thereof are denied. The Actavis Generic  
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1 Entities are without knowledge or information sufficient to form a belief as to the truth of the  
2 remaining allegations of Paragraph 335 and therefore deny the same.

3 336. To the extent that the allegations in Paragraph 336 relate to parties other than the  
4 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
5 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
6 extent that the allegations in Paragraph 336 purport to be based on documents, those documents  
7 speak for themselves, and all characterizations thereof are denied. The Actavis Generic Entities  
8 deny the remaining allegations in Paragraph 336.

9 337. The Actavis Generic Entities admit that known risks related to its opioid products  
10 are disclosed and addressed in the FPIs as required and approved by the FDA. Those FPIs are  
11 documents that speak for themselves, for those products, and any characterizations that are different  
12 than or inconsistent with the FPIs are denied. To the extent that the allegations in Paragraph 337  
13 relate to parties other than the Actavis Generic Entities, the Actavis Generic Entities are without  
14 knowledge or information sufficient to form a belief as to the truth of those allegations and therefore  
15 deny the same. The Actavis Generic Entities deny the remaining allegations in Paragraph 337.

16 338. The allegations in Paragraph 338 are not directed to the Actavis Generic Entities  
17 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
18 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
19 and therefore deny the same.

20 339. The allegations in Paragraph 339 are not directed to the Actavis Generic Entities  
21 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
22 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
23 and therefore deny the same.

24 340. The allegations in Paragraph 340 are not directed to the Actavis Generic Entities  
25 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
26 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
27 and therefore deny the same.

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1           341. The allegations in Paragraph 341 are not directed to the Actavis Generic Entities  
2 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
3 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
4 and therefore deny the same.

5           342. The allegations in Paragraph 342 are not directed to the Actavis Generic Entities  
6 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
7 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
8 and therefore deny the same.

9           343. The allegations in Paragraph 343 are not directed to the Actavis Generic Entities  
10 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
11 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
12 and therefore deny the same.

13           344. The allegations in Paragraph 344 are not directed to the Actavis Generic Entities  
14 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
15 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
16 and therefore deny the same.

17           345. To the extent that the allegations in Paragraph 345 relate to parties other than the  
18 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
19 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
20 extent that the allegations in Paragraph 345 purport to be based on documents, those documents  
21 speak for themselves, and all characterizations thereof are denied. The Actavis Generic Entities  
22 deny the remaining allegations in Paragraph 345.

23           346. The allegations in Paragraph 346 are not directed to the Actavis Generic Entities  
24 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
25 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
26 and therefore deny the same.

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1           347. The allegations in Paragraph 347 are not directed to the Actavis Generic Entities  
2 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
3 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
4 and therefore deny the same.

5           348. The allegations in Paragraph 348 are not directed to the Actavis Generic Entities  
6 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
7 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
8 and therefore deny the same.

9           349. The allegations in Paragraph 349 are not directed to the Actavis Generic Entities  
10 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
11 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
12 and therefore deny the same.

13           350. The allegations in Paragraph 350 are not directed to the Actavis Generic Entities  
14 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
15 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
16 and therefore deny the same.

17           351. The allegations in Paragraph 351 are not directed to the Actavis Generic Entities  
18 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
19 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
20 and therefore deny the same.

21           352. The allegations in Paragraph 352 are not directed to the Actavis Generic Entities  
22 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
23 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
24 and therefore deny the same.

25           353. The allegations in Paragraph 353 are not directed to the Actavis Generic Entities  
26 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
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1 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
2 and therefore deny the same.

3 354. The allegations in Paragraph 354 are not directed to the Actavis Generic Entities  
4 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
5 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
6 and therefore deny the same.

7 355. The allegations in Paragraph 355 are not directed to the Actavis Generic Entities  
8 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
9 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
10 and therefore deny the same.

11 356. The allegations in Paragraph 356 are not directed to the Actavis Generic Entities  
12 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
13 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
14 and therefore deny the same.

15 357. The allegations in Paragraph 357 are not directed to the Actavis Generic Entities  
16 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
17 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
18 and therefore deny the same.

19 358. The allegations in Paragraph 358 are not directed to the Actavis Generic Entities  
20 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
21 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
22 and therefore deny the same.

23 359. To the extent that the allegations in Paragraph 359 relate to parties other than the  
24 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
25 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
26 Actavis Generic Entities deny the remaining allegations in Paragraph 359.

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1           360. To the extent that the allegations in Paragraph 360 purport to be based on documents  
2 and/or quotes, those documents speak for themselves, and all characterizations thereof are denied.  
3 The Actavis Generic Entities are without knowledge or information sufficient to form a belief as to  
4 the truth of the allegations of Paragraph 360 and therefore deny the same.

5           361. The allegations in Paragraph 361 are not directed to the Actavis Generic Entities  
6 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
7 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
8 and therefore deny the same.

9           362. The allegations in Paragraph 362 are not directed to the Actavis Generic Entities  
10 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
11 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
12 and therefore deny the same.

13           363. The allegations in Paragraph 363 are not directed to the Actavis Generic Entities  
14 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
15 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
16 and therefore deny the same.

17           364. The allegations in Paragraph 364 are not directed to the Actavis Generic Entities  
18 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
19 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
20 and therefore deny the same.

21           365. The allegations in Paragraph 365 are not directed to the Actavis Generic Entities  
22 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
23 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
24 and therefore deny the same.

25           366. The allegations in Paragraph 366 are not directed to the Actavis Generic Entities  
26 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
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1 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
2 and therefore deny the same.

3 367. The allegations in Paragraph 367 are not directed to the Actavis Generic Entities  
4 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
5 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
6 and therefore deny the same.

7 368. The allegations in Paragraph 368 are not directed to the Actavis Generic Entities  
8 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
9 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
10 and therefore deny the same.

11 369. The allegations in Paragraph 369 are not directed to the Actavis Generic Entities  
12 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
13 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
14 and therefore deny the same.

15 370. The allegations in Paragraph 370 are not directed to the Actavis Generic Entities  
16 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
17 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
18 and therefore deny the same.

19 371. The allegations in Paragraph 371 are not directed to the Actavis Generic Entities  
20 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
21 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
22 and therefore deny the same.

23 372. The allegations in Paragraph 372 are not directed to the Actavis Generic Entities  
24 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
25 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
26 and therefore deny the same.

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1           373. The allegations in Paragraph 373 are not directed to the Actavis Generic Entities  
2 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
3 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
4 and therefore deny the same.

5           374. The allegations in Paragraph 374 are not directed to the Actavis Generic Entities  
6 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
7 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
8 and therefore deny the same.

9           375. The allegations in Paragraph 375 are not directed to the Actavis Generic Entities  
10 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
11 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
12 and therefore deny the same.

13           376. The allegations in Paragraph 376 are not directed to the Actavis Generic Entities  
14 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
15 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
16 and therefore deny the same.

17           377. The allegations in Paragraph 377 are not directed to the Actavis Generic Entities  
18 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
19 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
20 and therefore deny the same.

21           378. The allegations in Paragraph 378 are not directed to the Actavis Generic Entities  
22 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
23 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
24 and therefore deny the same.

25           379. The allegations in Paragraph 379 are not directed to the Actavis Generic Entities  
26 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
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1 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
2 and therefore deny the same.

3 380. The allegations in Paragraph 380 are not directed to the Actavis Generic Entities  
4 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
5 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
6 and therefore deny the same.

7 381. The allegations in Paragraph 381 are not directed to the Actavis Generic Entities  
8 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
9 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
10 and therefore deny the same.

11 382. The allegations in Paragraph 382 are not directed to the Actavis Generic Entities  
12 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
13 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
14 and therefore deny the same.

15 383. The allegations in Paragraph 383 are not directed to the Actavis Generic Entities  
16 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
17 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
18 and therefore deny the same.

19 384. The allegations in Paragraph 384 are not directed to the Actavis Generic Entities  
20 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
21 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
22 and therefore deny the same.

23 385. The allegations in Paragraph 385 are not directed to the Actavis Generic Entities  
24 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
25 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
26 and therefore deny the same.

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1           386. The allegations in Paragraph 386 are not directed to the Actavis Generic Entities  
2 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
3 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
4 and therefore deny the same.

5           387. The allegations in Paragraph 387 are not directed to the Actavis Generic Entities  
6 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
7 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
8 and therefore deny the same.

9           388. The allegations in Paragraph 388 are not directed to the Actavis Generic Entities  
10 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
11 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
12 and therefore deny the same.

13           389. The allegations in Paragraph 389 are not directed to the Actavis Generic Entities  
14 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
15 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
16 and therefore deny the same.

17           390. The allegations in Paragraph 390 are not directed to the Actavis Generic Entities  
18 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
19 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
20 and therefore deny the same.

21           391. The allegations in Paragraph 391 are not directed to the Actavis Generic Entities  
22 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
23 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
24 and therefore deny the same.

25           392. The allegations in Paragraph 392 are not directed to the Actavis Generic Entities  
26 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
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1 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
2 and therefore deny the same.

3 393. The allegations in Paragraph 393 are not directed to the Actavis Generic Entities  
4 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
5 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
6 and therefore deny the same.

7 394. The allegations in Paragraph 394 are not directed to the Actavis Generic Entities  
8 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
9 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
10 and therefore deny the same.

11 395. The allegations in Paragraph 395 are not directed to the Actavis Generic Entities  
12 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
13 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
14 and therefore deny the same.

15 396. The allegations in Paragraph 396 are not directed to the Actavis Generic Entities  
16 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
17 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
18 and therefore deny the same.

19 397. The allegations in Paragraph 397 are not directed to the Actavis Generic Entities  
20 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
21 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
22 and therefore deny the same.

23 398. The allegations in Paragraph 398 are not directed to the Actavis Generic Entities  
24 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
25 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
26 and therefore deny the same.

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1           399. To the extent that the allegations in Paragraph 399 relate to parties other than the  
2 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
3 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
4 Actavis Generic Entities deny the remaining allegations in Paragraph 399.

5           400. To the extent that the allegations in Paragraph 400 relate to parties other than the  
6 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
7 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
8 Actavis Generic Entities deny the remaining allegations in Paragraph 400.

9           401. To the extent that the allegations in Paragraph 401 relate to parties other than the  
10 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
11 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
12 Actavis Generic Entities deny the remaining allegations in Paragraph 401.

13           402. To the extent that the allegations in Paragraph 402 relate to parties other than the  
14 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
15 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
16 extent that the allegations in Paragraph 402 purport to be based on documents, those documents  
17 speak for themselves, and all characterizations thereof are denied. The Actavis Generic Entities  
18 deny the remaining allegations in Paragraph 402.

19           403. To the extent that the allegations in Paragraph 403 relate to parties other than the  
20 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
21 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
22 extent that the allegations in Paragraph 403 purport to be based on documents, including those  
23 referred to in footnote 141, those documents speak for themselves, and all characterizations thereof  
24 are denied. The Actavis Generic Entities deny the remaining allegations in Paragraph 403.

25           404. To the extent that the allegations in Paragraph 404 relate to parties other than the  
26 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
27 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
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1 extent that the allegations in Paragraph 404 purport to be based on documents, including those  
2 referred to in footnotes 142, 143, 144 and 145, those documents speak for themselves, and all  
3 characterizations thereof are denied. The Actavis Generic Entities deny the remaining allegations  
4 in Paragraph 404.

5 405. To the extent that the allegations in Paragraph 405 relate to parties other than the  
6 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
7 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
8 extent that the allegations in Paragraph 405 purport to be based on documents, including those  
9 referred to in footnote 146, those documents speak for themselves, and all characterizations thereof  
10 are denied. The Actavis Generic Entities deny the remaining allegations in Paragraph 405.

11 406. To the extent that the allegations in Paragraph 406 purport to be based on  
12 documents, including those referred to in footnotes 147 and 148, those documents speak for  
13 themselves, and all characterizations thereof are denied. The Actavis Generic Entities deny the  
14 remaining allegations in Paragraph 406.

15 407. The allegations in Paragraph 407 state argument and conclusions of law to which  
16 no response is required. To the extent that the allegations in Paragraph 407 relate to parties other  
17 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
18 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
19 same. To the extent that the allegations in Paragraph 407 purport to be based on documents, those  
20 documents speak for themselves, and all characterizations thereof are denied. To the extent a  
21 response is required, the Actavis Generic Entities deny the remaining allegations in Paragraph 407.

22 408. To the extent that the allegations in Paragraph 408 relate to parties other than the  
23 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
24 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
25 Actavis Generic Entities deny the remaining allegations of Paragraph 408.

26 409. To the extent the allegations in Paragraph 409 purport to be based on documents,  
27 those documents speak for themselves, and all characterizations thereof are denied. Further, to the  
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1 extent that the allegations in Paragraph 409 relate to parties other than the Actavis Generic Entities,  
2 the Actavis Generic Entities are without knowledge or information sufficient to form a belief as to  
3 the truth of those allegations and therefore deny the same. The Actavis Generic Entities deny the  
4 remaining allegations in Paragraph 409.

5 410. To the extent that the allegations in Paragraph 410 relate to parties other than the  
6 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
7 sufficient to form a belief as to the truth of the allegations and therefore deny the same. To the  
8 extent that the allegations in Paragraph 410 purport to be based on documents and/or websites,  
9 those documents and/or websites speak for themselves, and all characterizations thereof are denied.  
10 The Actavis Generic Entities are without knowledge or information sufficient to form a belief as to  
11 the truth of the remaining allegations and therefore deny the same.

12 411. To the extent that the allegations in Paragraph 411 relate to parties other than the  
13 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
14 sufficient to form a belief as to the truth of the allegations and therefore deny the same. The Actavis  
15 Generic Entities deny the remaining allegations in Paragraph 411.

16 412. To the extent that the allegations in Paragraph 412 relate to parties other than the  
17 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
18 sufficient to form a belief as to the truth of the allegations and therefore deny the same. The Actavis  
19 Generic Entities deny the remaining allegations in Paragraph 412.

20 413. The allegations in Paragraph 413 are not directed to the Actavis Generic Entities  
21 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
22 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
23 and therefore deny the same.

24 414. To the extent that the allegations in Paragraph 414 relate to parties other than the  
25 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
26 sufficient to form a belief as to the truth of the allegations and therefore deny the same. The Actavis  
27 Generic Entities deny the remaining allegations in Paragraph 414.

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1           415. To the extent that the allegations in Paragraph 415 relate to parties other than the  
2 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
3 sufficient to form a belief as to the truth of the allegations and therefore deny the same. To the  
4 extent that the allegations in Paragraph 415 purport to be based on documents, those documents  
5 speak for themselves, and all characterizations thereof are denied. The Actavis Generic Entities  
6 deny the remaining allegations in Paragraph 415.

7           416. To the extent that the allegations in Paragraph 416 relate to parties other than the  
8 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
9 sufficient to form a belief as to the truth of the allegations in Paragraph 416 and therefore deny the  
10 same. To the extent that the allegations in Paragraph 416 purport to be based on documents,  
11 including those referred to in footnote 149, those documents speak for themselves, and all  
12 characterizations thereof are denied. The Actavis Generic Entities deny the remaining allegations  
13 in Paragraph 416.

14           417. To the extent that the allegations in Paragraph 417 relate to parties other than the  
15 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
16 sufficient to form a belief as to the truth of the allegations in Paragraph 417 and therefore deny the  
17 same. The Actavis Generic Entities deny the remaining allegations in Paragraph 417.

18           418. To the extent that the allegations in Paragraph 418 relate to parties other than the  
19 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
20 sufficient to form a belief as to the truth of the allegations and therefore deny the same. To the  
21 extent that the allegations in Paragraph 418 purport to be based on documents, including those  
22 referred to in footnote 150, those documents speak for themselves, and all characterizations thereof  
23 are denied. The Actavis Generic Entities deny the remaining allegations in Paragraph 418.

24           419. To the extent that the allegations in Paragraph 419 relate to parties other than the  
25 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
26 sufficient to form a belief as to the truth of the allegations and therefore deny the same. To the  
27 extent that the allegations in Paragraph 419 purport to be based on documents, those documents  
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1 speak for themselves, and all characterizations thereof are denied. The Actavis Generic Entities  
2 deny the remaining allegations in Paragraph 419.

3 420. To the extent that the allegations in Paragraph 420 relate to parties other than the  
4 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
5 sufficient to form a belief as to the truth of the allegations and therefore deny the same. To the  
6 extent that the allegations in Paragraph 420 purport to be based on documents, those documents  
7 speak for themselves, and all characterizations thereof are denied. The Actavis Generic Entities  
8 deny the remaining allegations in Paragraph 420.

9 421. To the extent that the allegations in Paragraph 421 relate to parties other than the  
10 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
11 sufficient to form a belief as to the truth of the allegations and therefore deny the same. The Actavis  
12 Generic Entities deny the remaining allegations in Paragraph 421.

13 422. The Actavis Generic Entities admit that “AAPM and APS issued their own  
14 guidelines in 2009”. To the extent that the allegations in Paragraph 422 purport to be based on  
15 documents, those documents speak for themselves and the characterizations thereof are denied. To  
16 the extent that the allegations in Paragraph 422 relate to Defendants other than the Actavis Generic  
17 Entities, the Actavis Generic Entities are without knowledge or information sufficient to form a  
18 belief as to the truth of those allegations and therefore deny the same. The Actavis Generic Entities  
19 deny the remaining allegations in Paragraph 422.

20 423. The Actavis Generic Entities are without knowledge or information sufficient to  
21 form a belief as to the truth of the allegations of Paragraph 423 and therefore deny the same.

22 424. To the extent that the allegations in Paragraph 424 purport to be based on  
23 documents, those documents speak for themselves and the characterizations thereof are denied. The  
24 Actavis Generic Entities are without knowledge or information sufficient to form a belief as to the  
25 truth of the allegations in Paragraph 424 and therefore deny the same.

26 425. To the extent that the allegations in Paragraph 425 relate to parties other than the  
27 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
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1 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
2 extent that the allegations in Paragraph 425 purport to be based on documents, including those  
3 referred to in footnote 151, those documents speak for themselves, and all characterizations thereof  
4 are denied. The Actavis Generic Entities deny the remaining allegations in Paragraph 425.

5 426. The Actavis Generic Entities are without knowledge or information sufficient to  
6 form a belief as to the truth of the allegations in Paragraph 426 and therefore deny the same.

7 427. To the extent that the allegations in Paragraph 427 relate to parties other than the  
8 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
9 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
10 Actavis Generic Entities deny the remaining allegations in Paragraph 427.

11 428. The Actavis Generic Entities admit that the Federation of State Medical Boards  
12 (“FSMB”) is an organization that purports to represent the various state medical boards in the  
13 United States. The Actavis Generic Entities are without knowledge or information sufficient to  
14 form a belief as to the truth of the remaining allegations of Paragraph 428 and therefore deny the  
15 same.

16 429. The Actavis Generic Entities are without knowledge or information sufficient to  
17 form a belief as to the truth of the remaining allegations in Paragraph 429 and therefore deny the  
18 same.

19 430. The Actavis Generic Entities admit that the FSMB has been developing the Model  
20 Guidelines for the Use of Controlled Substances for the Treatments of Pain since 1998. To the  
21 extent that allegations in Paragraph 430 relate to parties other than the Actavis Generic Entities, the  
22 Actavis Generic Entities are without knowledge or information sufficient to form a belief as to truth  
23 of the allegations and therefore deny the same. To the extent that Paragraph 430 purports to be  
24 based on documents, those documents speak for themselves and all characterizations thereof are  
25 denied. The Actavis Generic Entities are without knowledge or information sufficient to form a  
26 belief as to truth of the remaining allegations in Paragraph 430 and therefore deny the same.

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1           431. To the extent that Paragraph 431 purports to be based on documents, those  
2 documents speak for themselves and all characterizations thereof are denied. The Actavis Generic  
3 Entities are without knowledge or information sufficient to form a belief as to truth of the remaining  
4 allegations of Paragraph 431 and therefore deny the same.

5           432. To the extent that allegations in Paragraph 432 relate to parties other than the Actavis  
6 Generic Entities, the Actavis Generic Entities are without knowledge or information sufficient to  
7 form a belief as to the truth of the allegations and therefore deny the same. To the extent that  
8 Paragraph 432 purports to be based on documents and/or websites, those documents and/or  
9 websites speak for themselves, and all characterizations thereof are denied. The Actavis Generic  
10 Entities are without knowledge or information sufficient to form a belief as to the truth of the  
11 remaining allegations of Paragraph 432 and therefore deny the same.

12           433. To the extent that allegations in Paragraph 433 relate to parties other than the Actavis  
13 Generic Entities, the Actavis Generic Entities are without knowledge or information sufficient to  
14 form a belief as to the truth of the allegations and therefore deny the same. To the extent that  
15 Paragraph 433 purports to be based on documents, those documents speak for themselves, and all  
16 characterizations thereof are denied. The Actavis Generic Entities deny the remaining allegations  
17 in Paragraph 433.

18           434. To the extent that allegations in Paragraph 434 relate to parties other than the Actavis  
19 Generic Entities, the Actavis Generic Entities are without knowledge or information sufficient to  
20 form a belief as to the truth of the allegations and therefore deny the same. To the extent that  
21 Paragraph 434 purports to be based on documents, including those referred to in footnotes 152 and  
22 153, those documents speak for themselves, and all characterizations thereof are denied. The  
23 Actavis Generic Entities are without knowledge or information sufficient to form a belief as to the  
24 truth of the remaining allegations of Paragraph 434 and therefore deny the same.

25           435. To the extent that allegations in Paragraph 435 relate to parties other than the Actavis  
26 Generic Entities, the Actavis Generic Entities are without knowledge or information sufficient to  
27 form a belief as to the truth of the allegations and therefore deny the same. To the extent that  
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1 Paragraph 435 purports to be based on documents and/or websites, including those referred to in  
2 footnote 154, those documents and/or websites speak for themselves, and all characterizations  
3 thereof are denied. The Actavis Generic Entities are without knowledge or information sufficient  
4 to form a belief as to the truth of the remaining allegations of Paragraph 435 and therefore deny the  
5 same.

6 436. To the extent that the allegations in Paragraph 436 purport to be based on  
7 documents, including those referred to in footnote 155 and 156, those documents speak for  
8 themselves, and all characterizations thereof are denied. The Actavis Generic Entities are without  
9 knowledge or information sufficient to form a belief as to the truth of the remaining allegations of  
10 Paragraph 436 and therefore deny the same.

11 437. To the extent that the allegations in Paragraph 437 purport to be based on  
12 documents, including those referred to in footnote 157, those documents speak for themselves, and  
13 all characterizations thereof are denied. The Actavis Generic Entities are without knowledge or  
14 information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 437  
15 and therefore deny the same.

16 438. To the extent that the allegations in Paragraph 438 purport to be based on  
17 documents, including those referred to in footnote 158, those documents speak for themselves, and  
18 all characterizations thereof are denied. The Actavis Generic Entities are without knowledge or  
19 information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 438  
20 and therefore deny the same.

21 439. To the extent that the allegations in Paragraph 439 purport to be based on  
22 documents, including those referred to in footnote 159, those documents speak for themselves, and  
23 all characterizations thereof are denied. The Actavis Generic Entities are without knowledge or  
24 information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 439  
25 and therefore deny the same.

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1           440. The Actavis Generic Entities are without knowledge or information sufficient to  
2 form a belief as to the truth of the remaining allegations of Paragraph 440 and therefore deny the  
3 same.

4           441. The allegations in Paragraph 441 state argument and conclusions of law to which  
5 no response is required. To the extent that the allegations in Paragraph 441 relate to parties other  
6 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
7 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
8 same. To the extent that the allegations in Paragraph 441 purport to be based on documents,  
9 including those referred to in footnote 160 and 161, those documents speak for themselves, and all  
10 characterizations thereof are denied. To the extent a response is required, the Actavis Generic  
11 Entities deny the allegations in Paragraph 441.

12           442. To the extent that the allegations in Paragraph 442 relate to parties other than the  
13 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
14 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
15 extent that the allegations in Paragraph 442 purport to be based on documents, including those  
16 referred to in footnote 162, those documents speak for themselves, and all characterizations thereof  
17 are denied. The Actavis Generic Entities deny the remaining allegations in Paragraph 442.

18           443. To the extent that the allegations in Paragraph 443 relate to parties other than the  
19 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
20 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
21 extent that the allegations in Paragraph 443 purport to be based on documents, including those  
22 referred to in footnote 163 and 164, those documents speak for themselves, and all characterizations  
23 thereof are denied. The Actavis Generic Entities deny the remaining allegations in Paragraph 443.

24           444. To the extent that the allegations in Paragraph 444 purport to be based on  
25 documents, including those referred to in footnote 165, those documents speak for themselves, and  
26 all characterizations thereof are denied. The Actavis Generic Entities are without knowledge or  
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1 information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 444  
2 and therefore deny the same.

3 445. To the extent that the allegations in Paragraph 445 relate to parties other than the  
4 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
5 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
6 extent that the allegations in Paragraph 445 purport to be based on documents, those documents  
7 speak for themselves, and all characterizations thereof are denied. The Actavis Generic Entities  
8 deny the remaining allegations in Paragraph 445.

9 446. To the extent that the allegations in Paragraph 446 relate to parties other than the  
10 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
11 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
12 Actavis Generic Entities deny the remaining allegations in Paragraph 446.

13 447. To the extent that the allegations in Paragraph 447 relate to parties other than the  
14 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
15 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
16 Actavis Generic Entities deny the remaining allegations in Paragraph 447.

17 448. To the extent that the allegations in Paragraph 448 relate to parties other than the  
18 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
19 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
20 Actavis Generic Entities deny the remaining allegations in Paragraph 448.

21 449. To the extent that the allegations in Paragraph 449 relate to parties other than the  
22 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
23 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
24 Actavis Generic Entities deny the remaining allegations in Paragraph 449.

25 450. To the extent that the allegations in Paragraph 450 relate to parties other than the  
26 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
27 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
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1 Actavis Generic Entities deny the remaining allegations in Paragraph 450. The Actavis Generic  
2 Entities specifically deny that it “exert[ed] control” over the modalities through which doctors  
3 receive information.

4 451. To the extent that the allegations in Paragraph 451 relate to parties other than the  
5 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
6 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
7 extent a response is required, the Actavis Generic Entities deny the allegations in Paragraph 451.

8 452. To the extent that the allegations in Paragraph 452 relate to parties other than the  
9 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
10 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
11 Actavis Generic Entities deny the remaining allegations in Paragraph 452.

12 453. To the extent that the allegations in Paragraph 453 relate to parties other than the  
13 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
14 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
15 Actavis Generic Entities deny the remaining allegations in Paragraph 453.

16 454. The allegations in Paragraph 454 state argument and conclusions of law to which  
17 no response is required. To the extent that the allegations in Paragraph 454 relate to parties other  
18 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
19 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
20 same. To the extent that a response is required, the Actavis Generic Entities deny the remaining  
21 allegations in Paragraph 454.

22 455. The Actavis Generic Entities admit only that Dr. Portenoy is the former Chairman  
23 of the Department of Pain Medicine and Palliative Care at Beth Israel Medical Center in New York.  
24 The Actavis Generic Entities are without knowledge or information sufficient to form a belief as to  
25 truth of the allegations in Paragraph 455 concerning statements made by Dr. Portenoy and therefore  
26 deny the same. To the extent that the allegations in Paragraph 455 relate to parties other than the  
27 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
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1 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
2 extent that the allegations in Paragraph 455 purport to be based on documents, including those  
3 referred to in footnote 166, those documents speak for themselves, and all characterizations thereof  
4 are denied. The Actavis Generic Entities deny the remaining allegations in Paragraph 455.

5 456. The allegations in Paragraph 456 are based on documents, including those referred  
6 to in footnotes 167 and 168, that speak for themselves, and all characterizations thereof are denied.  
7 The Actavis Generic Entities are without knowledge or information sufficient to form a belief as to  
8 the truth of the remaining allegations of Paragraph 456 and therefore deny the same.

9 457. To the extent that the allegations in Paragraph 457 relate to parties other than the  
10 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
11 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
12 extent the allegations in Paragraph 457 are based on documents, including those referred to in  
13 footnote 169, those documents speak for themselves, and all characterizations thereof are denied.  
14 The Actavis Generic Entities deny the remaining allegations in Paragraph 457.

15 458. The allegations in Paragraph 458 are not directed to the Actavis Generic Entities  
16 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
17 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
18 and therefore deny the same.

19 459. The Actavis Generic Entities admit only that Dr. Portenoy was on the Board of  
20 Directors of the APF and that he was the President of the APS. The Actavis Generic Entities deny  
21 the remaining allegations in Paragraph 459.

22 460. To the extent that the allegations in Paragraph 460 relate to parties other than The  
23 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
24 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
25 extent that the allegations in Paragraph 460 purport to be based on documents, including those  
26 referred to in footnotes 171, 172 and 173, those documents speak for themselves, and all  
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1 characterizations thereof are denied. The Actavis Generic Entities deny the remaining allegations  
2 in Paragraph 460.

3 461. To the extent that the allegations in Paragraph 461 relate to parties other than The  
4 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
5 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
6 extent that the allegations in Paragraph 461 purport to be based on documents, including those  
7 referred to in footnote 174, that speak for themselves, and all characterizations thereof are denied.  
8 The Actavis Generic Entities deny the remaining allegations in Paragraph 461.

9 462. To the extent that the allegations in Paragraph 462 purport to be based on documents  
10 and/quotes, include those referred to in footnote 175, those documents and/or quotes speak for  
11 themselves, and all characterizations thereof are denied. The Actavis Generic Entities are without  
12 knowledge or information sufficient to form a belief as to the truth of the remaining allegations and  
13 therefore deny the same.

14 463. The Actavis Generic Entities admit that Dr. Webster was a co-founder and Chief  
15 Medical Director of Lifetree Clinical Research and is a Senior Editor of Pain Medicine. To the  
16 extent that the allegations in Paragraph 463 relate to parties other than the Actavis Generic Entities,  
17 the Actavis Generic Entities are without knowledge or information sufficient to form a belief as to  
18 the truth of those allegations and therefore deny the same. The Actavis Generic Entities deny the  
19 remaining allegations in Paragraph 463.

20 464. To the extent that the allegations in Paragraph 464 relate to parties other than the  
21 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
22 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
23 extent that the allegations in Paragraph 464 purport to be based on documents and/or websites,  
24 those documents and/or websites speak for themselves, and all characterizations thereof are denied.  
25 The Actavis Generic Entities are without knowledge or information sufficient to form a belief as to  
26 the truth of the remaining allegations of Paragraph 464 and therefore deny the same.

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1           465. To the extent that the allegations in Paragraph 465 relate to parties other than the  
2 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
3 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
4 extent that the allegations in Paragraph 465 purport to be based on documents, those documents  
5 speak for themselves, and all characterizations thereof are denied. The Actavis Generic Entities are  
6 without knowledge or information sufficient to form a belief as to the truth of the remaining  
7 allegations of Paragraph 465 and therefore deny the same.

8           466. The presentation agenda and presentation referenced in Paragraph 466 are  
9 documents that speak for themselves and all characterizations thereof are denied. The Actavis  
10 Generic Entities deny the remaining allegations in Paragraph 466.

11           467. The CME referenced in Paragraph 467 is a document that speaks for itself and all  
12 characterizations thereof are denied.

13           468. To the extent that the allegations in Paragraph 468 relate to parties other than the  
14 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
15 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
16 Actavis Generic Entities deny the remaining allegations in Paragraph 468.

17           469. The Actavis Generic Entities are without knowledge or information sufficient to  
18 form a belief as to the truth of the allegations in Paragraph 469 and therefore deny the same.

19           470. The Actavis Generic Entities are without knowledge or information sufficient to  
20 form a belief as to the truth of the allegations in Paragraph 470 and therefore deny the same.

21           471. The allegations of Paragraph 471 purport to be based on documents, including those  
22 referred to in footnote 176, that speak for themselves, and all characterizations thereof are denied.

23           472. The allegations of Paragraph 472 purport to be based on documents, including those  
24 referred to in footnotes 177 and 178, that speak for themselves, and all characterizations thereof are  
25 denied.

26           473. The allegations of Paragraph 473 purport to be based on document, including those  
27 referred to in footnote 179, that speak for themselves, and all characterizations thereof are denied.

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1           474. The allegations of Paragraph 474 purport to be based on documents, including those  
2 referred to in footnotes 180 and 181, that speak for themselves, and all characterizations thereof are  
3 denied. The Actavis Generic Entities are without knowledge or information sufficient to form a  
4 belief as to the truth of the remaining allegations of Paragraph 474 and therefore deny the same.

5           475. The Actavis Generic Entities admit only that Dr. Fishman served as an APF board  
6 member and as president of the AAPM. The Actavis Generic Entities are without knowledge or  
7 information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 475  
8 and therefore deny the same.

9           476. The Actavis Generic Entities admit only that Dr. Fishman authored “Responsible  
10 Opioid Prescribing.” The allegations in Paragraph 476 are based on a document that speaks for  
11 itself and all characterizations thereof are denied.

12           477. The allegations in Paragraph 477 purport to be based on documents, including those  
13 referred to in footnote 183, that speak for themselves, and all characterizations thereof are denied.  
14 To the extent that the allegations in Paragraph 477 relate to parties other than the Actavis Generic  
15 Entities, the Actavis Generic Entities are without knowledge or information sufficient to form a  
16 belief as to the truth of the remaining allegations of Paragraph 477 and therefore deny the same.

17           478. The allegations in Paragraph 478 purport to be based on documents, including those  
18 referred to in footnote 184, that speak for themselves, and all characterizations thereof are denied.

19           479. The allegations in Paragraph 479 purport to be based on documents, including those  
20 referred to in footnote 185, that speak for themselves, and all characterizations thereof are denied.  
21 To the extent that the allegations in Paragraph 479 relate to parties other than the Actavis Generic  
22 Entities, the Actavis Generic Entities are without knowledge or information sufficient to form a  
23 belief as to the truth of the remaining allegations of Paragraph 479 and therefore deny the same.

24           480. To the extent the allegations in Paragraph 480 relate to parties other than the Actavis  
25 Generic Entities, the Actavis Generic Entities are without knowledge or information sufficient to  
26 form a belief as to the truth of those allegations and therefore deny the same. To the extent that  
27 Paragraph 480 purports to be based on documents, those documents speak for themselves, and all  
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1 characterizations thereof are denied. The Actavis Generic Entities deny the remaining allegations  
2 in Paragraph 480.

3 481. To the extent the allegations in Paragraph 481 relate to parties other than the Actavis  
4 Generic Entities, the Actavis Generic Entities are without knowledge or information sufficient to  
5 form a belief as to the truth of those allegations and therefore deny the same. To the extent that  
6 Paragraph 481 purports to be based on documents, those documents speak for themselves, and all  
7 characterizations thereof are denied. The Actavis Generic Entities deny the remaining allegations  
8 in Paragraph 481.

9 482. The Actavis Generic Entities admit only that CMEs are ongoing professional  
10 education programs provided to doctors and that doctors are required to attend a certain number of  
11 CME programs each year as a condition of their license. The Actavis Generic Entities are without  
12 knowledge or information sufficient to form a belief as to the truth of the remaining allegations of  
13 Paragraph 482 and therefore deny the same.

14 483. To the extent that the allegations in Paragraph 483 relate to parties other than the  
15 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
16 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
17 Actavis Generic Entities deny the remaining allegations in Paragraph 483.

18 484. To the extent that the allegations in Paragraph 484 relate to parties other than the  
19 Actavis Generic Entities, the Actavis Generic Entities without knowledge or information sufficient  
20 to form a belief as to the truth of those allegations and therefore deny the same. The Actavis Generic  
21 Entities deny the remaining allegations in Paragraph 484.

22 485. The allegations in Paragraph 485 are not directed to the Actavis Generic Entities  
23 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
24 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
25 and therefore deny the same.

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1           486.    The allegations in Paragraph 486 are not directed to the Actavis Generic Entities  
2 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
3 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
4 and therefore deny the same.

5           487.    The allegations in Paragraph 487 are not directed to the Actavis Generic Entities  
6 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
7 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
8 and therefore deny the same.

9           488.    The allegations in Paragraph 488 are not directed to the Actavis Generic Entities  
10 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
11 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
12 and therefore deny the same.

13           489.    The Actavis Generic Entities are without knowledge or information sufficient to  
14 form a belief as to the truth of the allegations of Paragraph 489 and therefore deny the same.

15           490.    To the extent that the allegations in Paragraph 490 relate to parties other than the  
16 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
17 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
18 extent that the allegations in Paragraph 490 are based on documents, those documents, including  
19 those referred to in footnote 187, speak for themselves and all characterizations thereof are denied.  
20 The Actavis Generic Entities are without knowledge or information sufficient to form a belief as to  
21 the truth of the remaining allegations of Paragraph 490 and therefore deny the same.

22           491.    The Actavis Generic Entities are without knowledge or information sufficient to  
23 form a belief as to the truth of the allegations of Paragraph 491 and therefore deny the same.

24           492.    The allegations in Paragraph 492 state arguments and conclusions of law to which  
25 no response is required. To the extent that the allegations in Paragraph 492 relate to parties other  
26 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
27 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
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1 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
2 allegations in Paragraph 492.

3 493. To the extent that the allegations in Paragraph 493 relate to parties other than the  
4 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
5 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
6 Actavis Generic Entities deny the remaining allegations in Paragraph 493.

7 494. To the extent that the allegations in Paragraph 494 relate to parties other than the  
8 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
9 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
10 Actavis Generic Entities deny the remaining allegations in Paragraph 494.

11 495. To the extent that the allegations in Paragraph 495 relate to parties other than the  
12 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
13 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
14 extent the allegations in Paragraph 495 are based on documents, those documents speak for  
15 themselves, and all characterizations thereof are denied. The Actavis Generic Entities deny the  
16 remaining allegations in Paragraph 495.

17 496. To the extent that the allegations in Paragraph 496 relate to parties other than the  
18 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
19 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
20 Actavis Generic Entities deny the remaining allegations in Paragraph 496.

21 497. The Actavis Generic Entities deny the allegations in Paragraph 497.

22 498. To the extent that the allegations in Paragraph 498 relate to parties other than the  
23 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
24 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
25 Actavis Generic Entities deny the remaining allegations in Paragraph 498.

26 499. To the extent that the allegations in Paragraph 499 relate to parties other than the  
27 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
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1 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
2 Actavis Generic Entities deny the remaining allegations in Paragraph 499.

3 500. To the extent that the allegations in Paragraph 500 relate to parties other than the  
4 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
5 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
6 Actavis Generic Entities deny the remaining allegations in Paragraph 500.

7 501. To the extent that the allegations in Paragraph 501 relate to parties other than the  
8 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
9 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
10 Actavis Generic Entities deny the remaining allegations in Paragraph 501.

11 502. The allegations in Paragraph 502 are based on documents, including those referred  
12 to in footnotes 190 and 191, that speak for themselves and all characterizations thereof are denied.

13 503. The allegations of Paragraph 503 state argument and conclusions of law to which  
14 no response is required. To the extent that the allegations in Paragraph 503 relate to parties other  
15 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
16 information sufficient to form a belief as to the truth of the allegations of Paragraph 503 and  
17 therefore deny the same. To the extent a response is required, the Actavis Generic Entities deny the  
18 remaining allegations in Paragraph 503.

19 504. The allegations of Paragraph 504 state argument and conclusions of law to which  
20 no response is required. To the extent the allegations of Paragraph 504 relate to parties other than  
21 the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
22 sufficient to form a belief as to the truth of the allegations of Paragraph 504 and deny the same. To  
23 the extent a response is required, the Actavis Generic Entities deny the remaining allegations in  
24 Paragraph 504. The Actavis Generic Entities specifically deny that it made any misrepresentations  
25 regarding its opioid products.

26 505. The allegations of Paragraph 505 state argument and conclusions of law to which  
27 no response is required. To the extent the allegations of Paragraph 505 relate to parties other than  
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1 the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
2 sufficient to form a belief as to the truth of the allegations of Paragraph 505 and therefore deny the  
3 same. The Actavis Generic Entities deny the remaining allegations in Paragraph 505.

4 506. The allegations of Paragraph 506 state argument and conclusions of law to which  
5 no response is required. To the extent the allegations of Paragraph 506 relate to parties other than  
6 the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
7 sufficient to form a belief as to the truth of the allegations of Paragraph 506 and therefore deny the  
8 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
9 allegations in Paragraph 506.

10 507. The allegations of Paragraph 507 are not directed to the Actavis Generic Entities  
11 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
12 are without knowledge or information sufficient to form a belief as to the truth of the allegations of  
13 Paragraph 507 and therefore deny the same.

14 508. The allegations of Paragraph 508 are not directed to the Actavis Generic Entities  
15 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
16 are without knowledge or information sufficient to form a belief as to the truth of the allegations of  
17 Paragraph 508 and therefore deny the same.

18 509. The allegations of Paragraph 509 are not directed to the Actavis Generic Entities  
19 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
20 are without knowledge or information sufficient to form a belief as to the truth of the allegations of  
21 Paragraph 509 and therefore deny the same.

22 510. The allegations of Paragraph 510 are not directed to the Actavis Generic Entities  
23 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
24 are without knowledge or information sufficient to form a belief as to the truth of the allegations of  
25 Paragraph 510 and therefore deny the same.

26 511. The allegations of Paragraph 511 are not directed to the Actavis Generic Entities  
27 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
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1 are without knowledge or information sufficient to form a belief as to the truth of the allegations of  
2 Paragraph 511 and therefore deny the same.

3 512. The allegations of Paragraph 512 are not directed to the Actavis Generic Entities  
4 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
5 are without knowledge or information sufficient to form a belief as to the truth of the allegations of  
6 Paragraph 512 and therefore deny the same.

7 513. To the extent that the allegations in Paragraph 513 relate to parties other than the  
8 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
9 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
10 Actavis Generic Entities deny the remaining allegations in Paragraph 513.

11 514. The allegations in Paragraph 514 are not directed to the Actavis Generic Entities  
12 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
13 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
14 and therefore deny the same.

15 515. The allegations in Paragraph 515 are not directed to the Actavis Generic Entities  
16 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
17 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
18 and therefore deny the same.

19 516. To the extent that the allegations in Paragraph 516 relate to parties other than the  
20 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
21 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
22 Actavis Generic Entities deny the remaining allegations in Paragraph 516.

23 517. The Actavis Generic Entities are without knowledge or information sufficient to  
24 form a belief as to the truth of the allegations in Paragraph 517 and therefore deny the same.

25 518. To the extent that the allegations in Paragraph 518 relate to parties other than the  
26 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
27 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
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1 extent the allegations in Paragraph 518 are based on documents, those documents speak for  
2 themselves and all characterizations thereof are denied. The Actavis Generic Entities deny the  
3 remaining allegations in Paragraph 518.

4 519. The allegations in Paragraph 519 are not directed to the Actavis Generic Entities  
5 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
6 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
7 and therefore deny the same.

8 520. The Actavis Generic Entities are without knowledge or information sufficient to  
9 form a belief as to the truth of the allegations of Paragraph 520 and therefore deny the same. To the  
10 extent that the allegations in Paragraph 520 purport to be based on documents, those documents  
11 speak for themselves and all characterizations thereof are denied.

12 521. To the extent that the allegations in Paragraph 521 relate to parties other than the  
13 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
14 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
15 extent that the allegations in Paragraph 521 purport to be based on documents, those documents  
16 speak for themselves and all characterizations thereof are denied. The Actavis Generic Entities  
17 deny the remaining allegations in Paragraph 521.

18 522. The Actavis Generic Entities are without knowledge or information sufficient to  
19 form a belief as to the truth of the allegations of Paragraph 522 and therefore deny the same.

20 523. The allegations in Paragraph 523 are not directed to the Actavis Generic Entities  
21 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
22 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
23 and therefore deny the same.

24 524. To the extent that the allegations in Paragraph 524 relate to parties other than the  
25 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
26 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
27 extent that the allegations in Paragraph 524 purport to be based on documents, including those  
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1 referred to in footnote 192, those documents speak for themselves and all characterizations thereof  
2 are denied. The Actavis Generic Entities deny the remaining allegations in Paragraph 524.

3 525. The allegations in Paragraph 525 are not directed to the Actavis Generic Entities  
4 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
5 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
6 and therefore deny the same.

7 526. The allegations in Paragraph 526 are not directed to the Actavis Generic Entities  
8 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
9 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
10 and therefore deny the same.

11 527. The allegations in Paragraph 527 are not directed to the Actavis Generic Entities  
12 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
13 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
14 and therefore deny the same.

15 528. The allegations in Paragraph 528 are not directed to the Actavis Generic Entities  
16 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
17 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
18 and therefore deny the same.

19 529. The allegations in Paragraph 529 are not directed to the Actavis Generic Entities  
20 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
21 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
22 and therefore deny the same.

23 530. The allegations in Paragraph 530 are not directed to the Actavis Generic Entities  
24 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
25 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
26 and therefore deny the same.

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1           531. The allegations in Paragraph 531 are not directed to the Actavis Generic Entities  
2 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
3 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
4 and therefore deny the same.

5           532. The allegations in Paragraph 532 are not directed to the Actavis Generic Entities  
6 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
7 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
8 and therefore deny the same.

9           533. The allegations in Paragraph 533 are not directed to the Actavis Generic Entities  
10 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
11 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
12 and therefore deny the same.

13           534. The allegations in Paragraph 534 are not directed to the Actavis Generic Entities  
14 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
15 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
16 and therefore deny the same.

17           535. The allegations in Paragraph 535 are not directed to the Actavis Generic Entities  
18 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
19 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
20 and therefore deny the same.

21           536. The allegations in Paragraph 536 are not directed to the Actavis Generic Entities  
22 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
23 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
24 and therefore deny the same.

25           537. The allegations in Paragraph 537 are not directed to the Actavis Generic Entities  
26 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
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1 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
2 and therefore deny the same.

3 538. To the extent that the allegations in Paragraph 538 relate to parties other than the  
4 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
5 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
6 Actavis Generic Entities deny the remaining allegations of Paragraph 538.

7 539. The allegations in Paragraph 539 are not directed to the Actavis Generic Entities  
8 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
9 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
10 and therefore deny the same.

11 540. The allegations in Paragraph 540 are not directed to the Actavis Generic Entities  
12 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
13 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
14 and therefore deny the same.

15 541. The Actavis Generic Entities deny the allegations in Paragraph 541. To the extent  
16 that the allegations in Paragraph 541 relate to parties other than the Actavis Generic Entities, the  
17 Actavis Generic Entities are without knowledge or information sufficient to form a belief as to the  
18 truth of those allegations and therefore deny the same. The Actavis Generic Entities specifically  
19 deny that it engaged in a “fraudulent marketing campaign.”

20 542. The Actavis Generic Entities are without knowledge or information sufficient to  
21 form a belief as to the truth of those allegations of Paragraph 542 and therefore deny the same.

22 543. The Actavis Generic Entities deny the allegations in Paragraph 543. To the extent  
23 that the allegations in Paragraph 543 relate to parties other than the Actavis Generic Entities, the  
24 Actavis Generic Entities are without knowledge or information sufficient to form a belief as to the  
25 truth of those allegations and therefore deny the same. The Actavis Generic Entities specifically  
26 deny that it engaged in a “fraudulent marketing campaign”.

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1           544. To the extent that the allegations in Paragraph 544 relate to parties other than the  
2 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
3 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
4 extent that the allegations in Paragraph 544 purport to be based on documents, those documents  
5 speak for themselves, and all characterizations thereof are denied. The Actavis Generic Entities  
6 deny the remaining allegations in Paragraph 544.

7           545. To the extent that allegations in Paragraph 545 relate to parties other than the Actavis  
8 Generic Entities, the Actavis Generic Entities are without knowledge or information sufficient to  
9 form a belief as to the truth of those allegations and therefore deny the same. To the extent that the  
10 allegations in Paragraph 545 purport to be based on documents, including those referred to in  
11 footnote 200, those documents speak for themselves, and all characterizations thereof are denied.  
12 The Actavis Generic Entities are without knowledge or information sufficient to form a belief as to  
13 the truth of the remaining allegations in Paragraph 545 and therefore deny the same.

14           546. To the extent that the allegations in Paragraph 546 purport to be based on  
15 documents, those documents speak for themselves, and all characterizations thereof are denied.  
16 The Actavis Generic Entities are without knowledge or information sufficient to form a belief as to  
17 the truth of the remaining allegations in Paragraph 546 and therefore deny the same.

18           547. The allegations in Paragraph 547 state argument and conclusions of law to which  
19 no response is required. To the extent that the allegations in Paragraph 547 relate to parties other  
20 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
21 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
22 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
23 allegations in Paragraph 547.

24           548. The allegations in Paragraph 548 state argument and conclusions of law to which  
25 no response is required. To the extent that the allegations in Paragraph 548 relate to parties other  
26 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
27 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
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1 same. To the extent that the allegations in Paragraph 548 purport to be based on statutes, laws or  
2 regulations, those statutes, laws and regulations speak for themselves, and all characterizations  
3 thereof are denied. To the extent a response is required, the Actavis Generic Entities deny the  
4 remaining allegations in Paragraph 548.

5 549. The allegations in Paragraph 549 state argument and conclusions of law to which  
6 no response is required. To the extent that the allegations in Paragraph 549 relate to parties other  
7 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
8 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
9 same. To the extent that the allegations in Paragraph 549 purport to be based on statutes, laws or  
10 regulations, those statutes, laws and regulations speak for themselves, and all characterizations  
11 thereof are denied. To the extent a response is required, the Actavis Generic Entities deny the  
12 remaining allegations in Paragraph 549.

13 550. To the extent that the allegations in Paragraph 550 relate to parties other than the  
14 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
15 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
16 extent that the allegations in Paragraph 550 purport to be based on documents, those documents  
17 speak for themselves, and all characterizations thereof are denied. The Actavis Generic Entities  
18 deny the remaining allegations in Paragraph 550.

19 551. To the extent that the allegations in Paragraph 551 purport to be based on  
20 documents, including those referred to in footnote 202, those documents speak for themselves, and  
21 all characterizations thereof are denied. The Actavis Generic Entities are without knowledge or  
22 information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 551  
23 and therefore deny the same.

24 552. The allegations in Paragraph 552 are not directed to the Actavis Generic Entities  
25 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
26 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
27 and therefore deny the same.

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1           553. The allegations in Paragraph 553 are not directed to the Actavis Generic Entities  
2 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
3 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
4 and therefore deny the same.

5           554. The allegations in Paragraph 554 are not directed to the Actavis Generic Entities  
6 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
7 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
8 and therefore deny the same.

9           555. The allegations in Paragraph 555 are not directed to the Actavis Generic Entities  
10 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
11 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
12 and therefore deny the same.

13           556. The allegations in Paragraph 556 are not directed to the Actavis Generic Entities  
14 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
15 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
16 and therefore deny the same.

17           557. The allegations in Paragraph 557 state argument and conclusions of law to which  
18 no response is required. To the extent that the allegations in Paragraph 557 relate to parties other  
19 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
20 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
21 same. To the extent a response is required, the Actavis Generic Entities are without knowledge or  
22 information sufficient to form a belief as to the truth of the allegations of Paragraph 557 and  
23 therefore deny the same.

24           558. The allegations in Paragraph 558 are not directed to the Actavis Generic Entities  
25 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
26 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
27 and therefore deny the same.

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1           559. The allegations in Paragraph 559 are not directed to the Actavis Generic Entities  
2 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
3 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
4 and therefore deny the same.

5           560. The allegations in Paragraph 560 are not directed to the Actavis Generic Entities  
6 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
7 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
8 and therefore deny the same.

9           561. The allegations in Paragraph 561 are not directed to the Actavis Generic Entities  
10 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
11 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
12 and therefore deny the same.

13           562. The allegations in Paragraph 562 are not directed to the Actavis Generic Entities  
14 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
15 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
16 and therefore deny the same.

17           563. The allegations in Paragraph 563 are not directed to the Actavis Generic Entities  
18 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
19 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
20 and therefore deny the same.

21           564. The allegations in Paragraph 564 are not directed to the Actavis Generic Entities  
22 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
23 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
24 and therefore deny the same.

25           565. The allegations in Paragraph 565 are not directed to the Actavis Generic Entities  
26 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
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1 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
2 and therefore deny the same.

3 566. The allegations in Paragraph 566 are not directed to the Actavis Generic Entities  
4 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
5 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
6 and therefore deny the same.

7 567. The allegations in Paragraph 567 are not directed to the Actavis Generic Entities  
8 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
9 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
10 and therefore deny the same.

11 568. The allegations in Paragraph 568 are not directed to the Actavis Generic Entities  
12 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
13 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
14 and therefore deny the same.

15 569. The allegations in Paragraph 569 are not directed to the Actavis Generic Entities  
16 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
17 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
18 and therefore deny the same.

19 570. The allegations in Paragraph 570 are not directed to the Actavis Generic Entities  
20 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
21 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
22 and therefore deny the same.

23 571. The allegations in Paragraph 571 are not directed to the Actavis Generic Entities  
24 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
25 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
26 and therefore deny the same.

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1           572. The allegations in Paragraph 572 are not directed to the Actavis Generic Entities  
2 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
3 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
4 and therefore deny the same.

5           573. The allegations in Paragraph 573 are not directed to the Actavis Generic Entities  
6 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
7 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
8 and therefore deny the same.

9           574. The allegations in Paragraph 574 are not directed to the Actavis Generic Entities  
10 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
11 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
12 and therefore deny the same.

13           575. The allegations in Paragraph 575 are not directed to the Actavis Generic Entities  
14 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
15 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
16 and therefore deny the same.

17           576. The allegations in Paragraph 576 are not directed to the Actavis Generic Entities  
18 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
19 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
20 and therefore deny the same.

21           577. The allegations in Paragraph 577 are not directed to the Actavis Generic Entities  
22 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
23 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
24 and therefore deny the same.

25           578. The allegations in Paragraph 578 are not directed to the Actavis Generic Entities  
26 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
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1 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
2 and therefore deny the same.

3 579. The allegations in Paragraph 579 state argument and conclusions of law to which  
4 no response is required. To the extent that the allegations in Paragraph 579 relate to parties other  
5 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
6 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
7 same. To the extent that the allegations in Paragraph 579 purport to be based on statutes, laws or  
8 regulations, those statutes, laws and regulations speak for themselves, and all characterizations  
9 thereof are denied. To the extent a response is required, the Actavis Generic Entities deny the  
10 remaining allegations in Paragraph 579.

11 580. The allegations in Paragraph 580 state argument and conclusions of law to which  
12 no response is required. To the extent that the allegations in Paragraph 580 relate to parties other  
13 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
14 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
15 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
16 allegations in Paragraph 580.

17 581. The allegations in Paragraph 581 state argument and conclusions of law to which  
18 no response is required. To the extent that the allegations in Paragraph 581 relate to parties other  
19 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
20 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
21 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
22 allegations in Paragraph 581.

23 582. The allegations in Paragraph 582 state argument and conclusions of law to which  
24 no response is required. To the extent that the allegations in Paragraph 582 relate to parties other  
25 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
26 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
27 same. To the extent that the allegations in Paragraph 582 purport to be based on statutes, laws or  
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1 regulations, those statutes, laws and regulations speak for themselves, and all characterizations  
2 thereof are denied. To the extent a response is required, the Actavis Generic Entities deny the  
3 remaining allegations in Paragraph 582.

4 583. The allegations in Paragraph 583 state argument and conclusions of law to which  
5 no response is required. To the extent that the allegations in Paragraph 583 relate to parties other  
6 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
7 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
8 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
9 allegations in Paragraph 583.

10 584. The allegations in Paragraph 584 state argument and conclusions of law to which  
11 no response is required. To the extent that the allegations in Paragraph 584 relate to parties other  
12 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
13 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
14 same. To the extent that the allegations in Paragraph 584 purport to be based on documents,  
15 including those referred to in footnote 208, those documents speak for themselves, and all  
16 characterizations thereof are denied. To the extent that the allegations in Paragraph 584 purport to  
17 be based on statutes, laws or regulations, those statutes, laws and regulations speak for themselves,  
18 and all characterizations thereof are denied. To the extent a response is required, the Actavis  
19 Generic Entities deny the remaining allegations in Paragraph 584.

20 585. The allegations in Paragraph 585 state argument and conclusions of law to which  
21 no response is required. To the extent that the allegations in Paragraph 585 relate to parties other  
22 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
23 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
24 same. To the extent that the allegations in Paragraph 585 purport to be based on statutes, laws or  
25 regulations, those statutes, laws and regulations speak for themselves, and all characterizations  
26 thereof are denied. To the extent a response is required, the Actavis Generic Entities deny the  
27 remaining allegations in Paragraph 585.

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1           586. To the extent that the allegations in Paragraph 586 purport to be based on  
2 documents, including those referred to in footnote 209, those documents speak for themselves, and  
3 all characterizations thereof are denied. To the extent that the allegations in Paragraph 586 purport  
4 to be based on statutes, laws or regulations, those statutes, laws and regulations speak for  
5 themselves, and all characterizations thereof are denied. To the extent a response is required, the  
6 Actavis Generic Entities deny the remaining allegations in Paragraph 586.

7           587. The allegations in Paragraph 587 purport to be based on statutes, laws or regulations,  
8 that speak for themselves, and all characterizations thereof are denied.

9           588. The allegations in Paragraph 588 purport to be based on statutes, laws or regulations,  
10 that speak for themselves, and all characterizations thereof are denied.

11           589. The allegations in Paragraph 589 state argument and conclusions of law to which  
12 no response is required. The allegations in Paragraph 589 purport to be based on statutes, laws or  
13 regulations, that speak for themselves, and all characterizations thereof are denied. To the extent a  
14 response is required, the Actavis Generic Entities deny the remaining allegations in Paragraph 589.

15           590. The allegations in Paragraph 590 state argument and conclusions of law to which  
16 no response is required. To the extent that the allegations in Paragraph 590 relate to parties other  
17 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
18 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
19 same. To the extent that the allegations in Paragraph 590 purport to be based on statutes, laws or  
20 regulations, those statutes, laws and regulations speak for themselves, and all characterizations  
21 thereof are denied. To the extent a response is required, the Actavis Generic Entities deny the  
22 remaining allegations in Paragraph 590.

23           591. The allegations in Paragraph 591 state argument and conclusions of law to which  
24 no response is required. To the extent that the allegations in Paragraph 591 relate to parties other  
25 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
26 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
27 same. To the extent that the allegations in Paragraph 591 purport to be based on statutes, laws or  
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1 regulations, those statutes, laws and regulations speak for themselves, and all characterizations  
2 thereof are denied. To the extent a response is required, the Actavis Generic Entities deny the  
3 remaining allegations in Paragraph 591.

4 592. The allegations in Paragraph 592 state argument and conclusions of law to which  
5 no response is required. To the extent that the allegations in Paragraph 592 relate to parties other  
6 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
7 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
8 same. To the extent that the allegations in Paragraph 592 purport to be based on statutes, laws or  
9 regulations, those statutes, laws and regulations speak for themselves, and all characterizations  
10 thereof are denied. To the extent a response is required, the Actavis Generic Entities deny the  
11 remaining allegations in Paragraph 592.

12 593. The allegations in Paragraph 593 are not directed to the Actavis Generic Entities  
13 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
14 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
15 and therefore deny the same.

16 594. The allegations in Paragraph 594 state argument and conclusions of law to which  
17 no response is required. To the extent that the allegations in Paragraph 594 relate to parties other  
18 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
19 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
20 same. To the extent that the allegations in Paragraph 594 purport to be based on statutes, laws or  
21 regulations, those statutes, laws and regulations speak for themselves, and all characterizations  
22 thereof are denied. To the extent a response is required, the Actavis Generic Entities deny the  
23 remaining allegations in Paragraph 594.

24 595. The allegations in Paragraph 595 state argument and conclusions of law to which  
25 no response is required. To the extent that the allegations in Paragraph 595 relate to parties other  
26 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
27 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
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1 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
2 allegations in Paragraph 595.

3 596. The allegations in Paragraph 596 state argument and conclusions of law to which  
4 no response is required. To the extent that the allegations in Paragraph 596 relate to parties other  
5 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
6 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
7 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
8 allegations in Paragraph 596.

9 597. The allegations in Paragraph 597 are not directed to the Actavis Generic Entities  
10 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
11 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
12 and therefore deny the same.

13 598. The allegations in Paragraph 598 state argument and conclusions of law to which  
14 no response is required. To the extent that the allegations in Paragraph 598 relate to parties other  
15 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
16 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
17 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
18 allegations in Paragraph 598.

19 599. The allegations in Paragraph 599 are not directed to the Actavis Generic Entities  
20 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
21 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
22 and therefore deny the same.

23 600. To the extent that the allegations in Paragraph 600 relate to parties other than the  
24 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
25 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
26 extent that the allegations in Paragraph 600 purport to be based on documents, those documents  
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1 speak for themselves, and all characterizations thereof are denied. To the extent a response is  
2 required, the Actavis Generic Entities deny the remaining allegations in Paragraph 600..

3 601. The allegations in Paragraph 601 state argument and conclusions of law to which  
4 no response is required. To the extent that the allegations in Paragraph 601 relate to parties other  
5 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
6 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
7 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
8 allegations in Paragraph 601.

9 602. To the extent that the allegations in Paragraph 602 purport to be based on  
10 documents, those documents speak for themselves, and all characterizations thereof are denied. The  
11 Actavis Generic Entities are without knowledge or information sufficient to form a belief as to the  
12 truth of the remaining allegations in Paragraph 602 and therefore deny the same.

13 603. The allegations in Paragraph 603 state argument and conclusions of law to which  
14 no response is required. To the extent that the allegations in Paragraph 603 relate to parties other  
15 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
16 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
17 same. To the extent that the allegations in Paragraph 603 purport to be based on documents, those  
18 documents speak for themselves, and all characterizations thereof are denied. To the extent that the  
19 allegations in Paragraph 603 purport to be based on statutes, laws or regulations, those statutes,  
20 laws and regulations speak for themselves, and all characterizations thereof are denied. To the  
21 extent a response is required, the Actavis Generic Entities deny the remaining allegations in  
22 Paragraph 603.

23 604. The allegations in Paragraph 604 state argument and conclusions of law to which  
24 no response is required. To the extent that the allegations in Paragraph 604 relate to parties other  
25 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
26 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
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1 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
2 allegations in Paragraph 604.

3 605. To the extent that the allegations in Paragraph 605 relate to parties other than the  
4 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
5 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
6 extent that the allegations in Paragraph 605 purport to be based on documents, those documents  
7 speak for themselves, and all characterizations thereof are denied. The Actavis Generic Entities  
8 deny the remaining allegations in Paragraph 605.

9 606. To the extent that the allegations in Paragraph 606 relate to parties other than the  
10 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
11 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
12 extent that the allegations in Paragraph 606 purport to be based on documents, those documents  
13 speak for themselves, and all characterizations thereof are denied. The Actavis Generic Entities  
14 deny the remaining allegations in Paragraph 606.

15 607. To the extent that the allegations in Paragraph 607 relate to parties other than the  
16 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
17 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
18 extent that the allegations in Paragraph 607 purport to be based on documents, those documents  
19 speak for themselves, and all characterizations thereof are denied. The Actavis Generic Entities  
20 deny the remaining allegations in Paragraph 607.

21 608. The allegations in Paragraph 608 state argument and conclusions of law to which  
22 no response is required. To the extent that the allegations in Paragraph 608 relate to parties other  
23 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
24 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
25 same. To the extent that the allegations in Paragraph 608 purport to be based on documents, those  
26 documents speak for themselves, and all characterizations thereof are denied. To the extent a  
27 response is required, the Actavis Generic Entities deny the remaining allegations in Paragraph 608.

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1           609. The allegations in Paragraph 609 state argument and conclusions of law to which  
2 no response is required. To the extent that the allegations in Paragraph 609 relate to parties other  
3 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
4 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
5 same. The Actavis Generic Entities deny the remaining allegations in Paragraph 609.

6           610. To the extent that the allegations in Paragraph 610 purport to be based on  
7 documents, those documents speak for themselves, and all characterizations thereof are denied.  
8 The Actavis Generic Entities are without knowledge or information sufficient to form a belief as to  
9 the truth of the remaining allegations of Paragraph 610 and therefore deny the same.

10           611. The allegations in Paragraph 611 purport to be based on documents, including those  
11 referred to in footnotes 210 and 211, that speak for themselves, and all characterizations thereof are  
12 denied. The Actavis Generic Entities are without knowledge or information sufficient to form a  
13 belief as to the truth of the remaining allegations of Paragraph 611 and therefore deny the same.

14           612. To the extent that the allegations in Paragraph 612 relate to parties other than the  
15 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information to  
16 form a belief as to the truth of those allegations and therefore deny the same. To the extent that the  
17 allegations in Paragraph 612 purport to be based on documents, including those referred to in  
18 footnote 212, 213 and 214, those documents speak for themselves, and all characterizations thereof  
19 are denied. The Actavis Generic Entities deny the remaining allegations in Paragraph 612.

20           613. To the extent that the allegations in Paragraph 613 relate to parties other than the  
21 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information to  
22 form a belief as to the truth of those allegations and therefore deny the same. To the extent that the  
23 allegations in Paragraph 613 purport to be based on documents and/or websites, including those  
24 referred to in footnotes 215 and 216, those documents and/or websites speak for themselves, and  
25 all characterizations thereof are denied. The Actavis Generic Entities deny the remaining  
26 allegations in Paragraph 613.

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1           614. To the extent that the allegations in Paragraph 614 relate to parties other than the  
2 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information to  
3 form a belief as to the truth of those allegations and therefore deny the same. To the extent that the  
4 allegations in Paragraph 614 purport to be based on documents and/or websites, including those  
5 referred to in footnote 217, those documents and/or websites speak for themselves, and all  
6 characterizations thereof are denied. The Actavis Generic Entities deny the remaining allegations  
7 in Paragraph 614.

8           615. To the extent that the allegations in Paragraph 615 relate to parties other than the  
9 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information to  
10 form a belief as to the truth of those allegations and therefore deny the same. To the extent that the  
11 allegations in Paragraph 615 purport to be based on documents, including those referred to in  
12 footnote 218, those documents speak for themselves, and all characterizations thereof are denied.  
13 The Actavis Generic Entities deny the remaining allegations in Paragraph 615.

14           616. To the extent that the allegations in Paragraph 616 relate to parties other than the  
15 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information to  
16 form a belief as to the truth of those allegations and therefore deny the same. To the extent that the  
17 allegations in Paragraph 616 purport to be based on documents, those documents speak for  
18 themselves, and all characterizations thereof are denied. The Actavis Generic Entities deny the  
19 remaining allegations in Paragraph 616.

20           617. To the extent that the allegations in Paragraph 617 relate to parties other than the  
21 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information to  
22 form a belief as to the truth of those allegations and therefore deny the same. The Actavis Generic  
23 Entities deny the remaining allegations in Paragraph 617.

24           618. To the extent that the allegations in Paragraph 618 relate to parties other than the  
25 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information to  
26 form a belief as to the truth of those allegations and therefore deny the same. To the extent that the  
27 allegations in Paragraph 618 purport to be based on documents, including those referred to in  
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1 footnotes 219, 220 and 221, those documents speak for themselves, and all characterizations thereof  
2 are denied. The Actavis Generic Entities deny the remaining allegations in Paragraph 618.

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4 619. To the extent that the allegations in Paragraph 619 relate to parties other than the  
5 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information to  
6 form a belief as to the truth of those allegations and therefore deny the same. To the extent that the  
7 allegations in Paragraph 619 purport to be based on documents, those documents speak for  
8 themselves, and all characterizations thereof are denied. The Actavis Generic Entities deny the  
9 remaining allegations in Paragraph 619.

10 620. To the extent that the allegations in Paragraph 620 relate to parties other than the  
11 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information to  
12 form a belief as to the truth of those allegations and therefore deny the same. To the extent that the  
13 allegations in Paragraph 620 purport to be based on documents and/or websites, those documents  
14 and/or websites speak for themselves, and all characterizations thereof are denied. The Actavis  
15 Generic Entities deny the remaining allegations in Paragraph 620.

16 621. The allegations in Paragraph 621 state argument and conclusions of law to which  
17 no response is required. To the extent that the allegations in Paragraph 621 relate to parties other  
18 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
19 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
20 same. To the extent a response is required, the Actavis Generic Entities deny the allegations of  
21 Paragraph 621. The Actavis Generic Entities specifically deny that it engaged in “the unlawful sale  
22 of prescription opioids.”

23 622. To the extent that the allegations in Paragraph 622 relate to parties other than the  
24 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
25 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
26 Actavis Generic Entities deny the remaining allegations in Paragraph 622. The Actavis Generic  
27 Entities specifically deny that it engaged in “the unlawful sale of prescription opioids.”  
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1           623. To the extent that the allegations in Paragraph 623 relate to parties other than the  
2 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information to  
3 form a belief as to the truth of those allegations and therefore deny the same. To the extent that the  
4 allegations in Paragraph 623 purport to be based on documents, those documents speak for  
5 themselves, and all characterizations thereof are denied. The Actavis Generic Entities deny the  
6 remaining allegations in Paragraph 623.

7           624. To the extent that the allegations in Paragraph 624 relate to parties other than the  
8 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information to  
9 form a belief as to the truth of those allegations and therefore deny the same. To the extent that the  
10 allegations in Paragraph 624 purport to be based on documents and/or speeches, those documents  
11 and/or speeches speak for themselves, and all characterizations thereof are denied. The Actavis  
12 Generic Entities deny the remaining allegations in Paragraph 624.

13           625. The allegations in Paragraph 625 state argument and conclusions of law to which  
14 no response is required. To the extent that the allegations in Paragraph 625 relate to parties other  
15 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
16 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
17 same. To the extent a response is required, the Actavis Generic Entities deny the allegations of  
18 Paragraph 625.

19           626. The allegations in Paragraph 626 state argument and conclusions of law to which  
20 no response is required. To the extent that the allegations in Paragraph 626 relate to parties other  
21 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
22 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
23 same. To the extent a response is required, the Actavis Generic Entities deny the allegations of  
24 Paragraph 626.

25           627. The allegations in Paragraph 627 state argument and conclusions of law to which  
26 no response is required. To the extent that the allegations in Paragraph 627 relate to parties other  
27 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
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1 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
2 same. To the extent a response is required, the Actavis Generic Entities deny the allegations of  
3 Paragraph 627.

4 628. The allegations in Paragraph 628 state argument and conclusions of law to which  
5 no response is required. To the extent that the allegations in Paragraph 628 relate to parties other  
6 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
7 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
8 same. To the extent a response is required, the Actavis Generic Entities deny the allegations of  
9 Paragraph 628.

10 629. The allegations in Paragraph 629 state argument and conclusions of law to which  
11 no response is required. To the extent that the allegations in Paragraph 629 relate to parties other  
12 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
13 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
14 same. To the extent a response is required, the Actavis Generic Entities deny the allegations of  
15 Paragraph 629.

16 630. To the extent that the allegations in Paragraph 630 relate to parties other than the  
17 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
18 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
19 extent a response is required, the Actavis Generic Entities deny the remaining allegations of  
20 Paragraph 630.

21 631. To the extent that the allegations in Paragraph 631 relate to parties other than the  
22 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
23 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
24 extent that the allegations in Paragraph 631 purport to be based on documents, those documents  
25 speak for themselves, and all characterizations thereof are denied. The Actavis Generic Entities  
26 deny the allegations in Paragraph 631.

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1           632. The allegations in Paragraph 632 state argument and conclusions of law to which  
2 no response is required. To the extent that the allegations in Paragraph 632 relate to parties other  
3 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
4 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
5 same. To the extent that the allegations in Paragraph 632 purport to be based on documents, those  
6 documents speak for themselves, and all characterizations thereof are denied. To the extent a  
7 response is required, the Actavis Generic Entities deny the allegations in Paragraph 632.

8           633. The allegations in Paragraph 633 state argument and conclusions of law to which  
9 no response is required. To the extent that the allegations in Paragraph 633 relate to parties other  
10 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
11 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
12 same. To the extent that the allegations in Paragraph 633 purport to be based on documents, those  
13 documents speak for themselves, and all characterizations thereof are denied. To the extent that a  
14 response is required, the Actavis Generic Entities deny the allegations in Paragraph 633.

15           634. The allegations in Paragraph 634 state argument and conclusions of law to which  
16 no response is required. To the extent that the allegations in Paragraph 634 relate to parties other  
17 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
18 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
19 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
20 allegations of Paragraph 634.

21           635. To the extent that the allegations in Paragraph 635 relate to parties other than the  
22 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
23 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
24 Actavis Generic Entities deny the remaining allegations in Paragraph 635.

25           636. The allegations in Paragraph 636 are not directed to the Actavis Generic Entities  
26 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
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1 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
2 and therefore deny the same.

3 637. To the extent that the allegations in Paragraph 637 relate to parties other than the  
4 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
5 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
6 extent that the allegations in Paragraph 637 purport to be based on documents, including those  
7 referred to in footnote 223, those documents speak for themselves, and all characterizations thereof  
8 are denied. The Actavis Generic Entities deny the remaining allegations in Paragraph 637.

9 638. To the extent that the allegations in Paragraph 638 relate to parties other than the  
10 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
11 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
12 extent that the allegations in Paragraph 638 purport to be based on documents, those documents  
13 speak for themselves, and all characterizations thereof are denied. The Actavis Generic Entities  
14 deny the remaining allegations in Paragraph 638.

15 639. To the extent that the allegations in Paragraph 639 relate to parties other than the  
16 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
17 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
18 extent that the allegations in Paragraph 639 purport to be based on documents, including those  
19 referred to in footnote 224, those documents speak for themselves, and all characterizations thereof  
20 are denied. The Actavis Generic Entities deny the remaining allegations in Paragraph 639.

21 640. To the extent that the allegations in Paragraph 640 relate to parties other than the  
22 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
23 sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the  
24 extent that the allegations in Paragraph 640 purport to be based on documents, including those  
25 referred to in footnote 225, those documents speak for themselves, and all characterizations thereof  
26 are denied. The Actavis Generic Entities deny the remaining allegations in Paragraph 640.

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1           641. To the extent that the allegations in Paragraph 641 relate to parties other than the  
2 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
3 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
4 Actavis Generic Entities deny the remaining allegations in Paragraph 641.

5           642. The allegations in Paragraph 642 state argument and conclusions of law to which  
6 no response is required. To the extent that the allegations in Paragraph 642 relate to parties other  
7 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
8 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
9 same. To the extent that the allegations in Paragraph 642 purport to be based on documents, those  
10 documents speak for themselves, and all characterizations thereof are denied. To the extent a  
11 response is required, the Actavis Generic Entities deny the remaining allegations of Paragraph 642.

12           643. The Actavis Generic Entities are without knowledge or information sufficient to  
13 form a belief as to the truth of the allegations in Paragraph 643 and therefore deny the same

14           644. To the extent that the allegations in Paragraph 644 relate to parties other than the  
15 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
16 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
17 Actavis Generic Entities deny the remaining allegations in Paragraph 644.

18           645. The allegations in Paragraph 645 are not directed to the Actavis Generic Entities  
19 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
20 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
21 and therefore deny the same.

22           646. The allegations in Paragraph 646 are not directed to the Actavis Generic Entities  
23 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
24 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
25 and therefore deny the same.

26           647. To the extent that the allegations in Paragraph 647 relate to parties other than the  
27 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information

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1 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
2 Actavis Generic Entities deny the remaining allegations in Paragraph 647.

3 648. The allegations in Paragraph 648 state argument and conclusions of law to which  
4 no response is required. To the extent that the allegations in Paragraph 648 relate to parties other  
5 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
6 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
7 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
8 allegations of Paragraph 648.

9 649. The allegations in Paragraph 649 are not directed to the Actavis Generic Entities  
10 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
11 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
12 and therefore deny the same.

13 650. The allegations in Paragraph 650 are not directed to the Actavis Generic Entities  
14 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
15 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
16 and therefore deny the same.

17 651. To the extent that the allegations in Paragraph 651 relate to parties other than the  
18 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
19 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
20 Actavis Generic Entities deny the remaining allegations in Paragraph 651.

21 652. To the extent that the allegations in Paragraph 652 relate to parties other than the  
22 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
23 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
24 Actavis Generic Entities deny the remaining allegations in Paragraph 652.

25 653. To the extent that the allegations in Paragraph 653 relate to parties other than the  
26 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
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1 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
2 Actavis Generic Entities deny the remaining allegations in Paragraph 653.

3 654. The allegations in Paragraph 654 are not directed to the Actavis Generic Entities  
4 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
5 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
6 and therefore deny the same.

7 655. To the extent that the allegations in Paragraph 655 relate to parties other than the  
8 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
9 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
10 Actavis Generic Entities deny the remaining allegations in Paragraph 655.

11 656. The allegations in Paragraph 656 state argument and conclusions of law to which  
12 no response is required. To the extent that the allegations in Paragraph 656 relate to parties other  
13 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
14 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
15 same. To the extent that a response is required, the Actavis Generic Entities deny the remaining  
16 allegations in Paragraph 656.

17 657. The allegations in Paragraph 657 state argument and conclusions of law to which  
18 no response is required. To the extent that the allegations in Paragraph 657 relate to parties other  
19 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
20 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
21 same. To the extent that a response is required, the Actavis Generic Entities deny the remaining  
22 allegations in Paragraph 657.

23 658. The allegations in Paragraph 658 are not directed to the Actavis Generic Entities  
24 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
25 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
26 and therefore deny the same.

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1           659. The allegations in Paragraph 659 are not directed to the Actavis Generic Entities  
2 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
3 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
4 and therefore deny the same.

5           660. The allegations in Paragraph 660 are not directed to the Actavis Generic Entities  
6 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
7 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
8 and therefore deny the same.

9           661. The allegations in Paragraph 661 are not directed to the Actavis Generic Entities  
10 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
11 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
12 and therefore deny the same.

13           662. The allegations in Paragraph 662 are not directed to the Actavis Generic Entities  
14 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
15 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
16 and therefore deny the same.

17           663. The allegations in Paragraph 663 are not directed to the Actavis Generic Entities  
18 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
19 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
20 and therefore deny the same.

21           664. The allegations in Paragraph 664 are not directed to the Actavis Generic Entities  
22 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
23 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
24 and therefore deny the same.

25           665. The allegations in Paragraph 665 are not directed to the Actavis Generic Entities  
26 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
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1 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
2 and therefore deny the same.

3 666. The allegations in Paragraph 666 are not directed to the Actavis Generic Entities  
4 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
5 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
6 and therefore deny the same.

7 667. The allegations in Paragraph 667 state argument and conclusions of law to which  
8 no response is required. To the extent that the allegations in Paragraph 667 relate to parties other  
9 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
10 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
11 same. To the extent that a response is required, the Actavis Generic Entities deny the remaining  
12 allegations in Paragraph 667.

13 668. The allegations in Paragraph 668 state argument and conclusions of law to which  
14 no response is required. To the extent that the allegations in Paragraph 668 relate to parties other  
15 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
16 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
17 same. To the extent that a response is required, the Actavis Generic Entities deny the remaining  
18 allegations in Paragraph 668.

19 669. The allegations in Paragraph 669 are not directed to the Actavis Generic Entities  
20 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
21 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
22 and therefore deny the same.

23 670. The allegations in Paragraph 670 are not directed to the Actavis Generic Entities  
24 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
25 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
26 and therefore deny the same.

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1           671. The allegations in Paragraph 671 are not directed to the Actavis Generic Entities  
2 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
3 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
4 and therefore deny the same.

5           672. The allegations in Paragraph 672 are not directed to the Actavis Generic Entities  
6 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
7 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
8 and therefore deny the same.

9           673. The allegations in Paragraph 673 state argument and conclusions of law to which  
10 no response is required. To the extent that the allegations in Paragraph 673 relate to parties other  
11 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
12 information to form a belief as to the truth of those allegations and therefore deny the same. To the  
13 extent that the allegations in Paragraph 673 purport to be based on documents, including those  
14 referred to in footnote 232, those documents speak for themselves, and all characterizations thereof  
15 are denied. To the extent a response is required, the Actavis Generic Entities deny the remaining  
16 allegations in Paragraph 673.

17           674. The allegations in Paragraph 674 state argument and conclusions of law to which  
18 no response is required. To the extent that the allegations in Paragraph 674 relate to parties other  
19 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
20 information to form a belief as to the truth of those allegations and therefore deny the same. To the  
21 extent that the allegations in Paragraph 674 purport to be based on documents, those documents  
22 speak for themselves, and all characterizations thereof are denied. To the extent a response is  
23 required, the Actavis Generic Entities deny the remaining allegations in Paragraph 674

24           675. The allegations in Paragraph 675 are not directed to the Actavis Generic Entities  
25 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
26 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
27 and therefore deny the same.

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1           676. The allegations in Paragraph 676 state argument and conclusions of law to which  
2 no response is required. To the extent that the allegations in Paragraph 676 relate to parties other  
3 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
4 information to form a belief as to the truth of those allegations and therefore deny the same. To the  
5 extent a response is required, the Actavis Generic Entities deny the remaining allegations in  
6 Paragraph 676

7           677. The allegations in Paragraph 677 are not directed to the Actavis Generic Entities  
8 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
9 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
10 and therefore deny the same.

11           678. The allegations in Paragraph 678 are not directed to the Actavis Generic Entities  
12 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
13 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
14 and therefore deny the same.

15           679. The allegations in Paragraph 679 are not directed to the Actavis Generic Entities  
16 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
17 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
18 and therefore deny the same.

19           680. The allegations in Paragraph 680 state argument and conclusions of law to which  
20 no response is required. To the extent that the allegations in Paragraph 680 relate to parties other  
21 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
22 information to form a belief as to the truth of those allegations and therefore deny the same. To the  
23 extent a response is required, the Actavis Generic Entities deny the remaining allegations in  
24 Paragraph 680.

25           681. The Actavis Generic Entities are without knowledge or information sufficient to  
26 form a belief as to the truth of the allegations of Paragraph 681 and therefore deny the same.  
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1           682. The Actavis Generic Entities are without knowledge or information sufficient to  
2 form a belief as to the truth of the allegations of Paragraph 682 and therefore deny the same.

3           683. The Actavis Generic Entities are without knowledge or information sufficient to  
4 form a belief as to the truth of the allegations of Paragraph 683 and therefore deny the same.

5           684. The Actavis Generic Entities are without knowledge or information sufficient to  
6 form a belief as to the truth of the allegations of Paragraph 684 and therefore deny the same.

7           685. To the extent that allegations in Paragraph 685 relate to parties other than the Actavis  
8 Generic Entities, the Actavis Generic Entities are without knowledge or information sufficient to  
9 form a belief as to the truth of those allegations and therefore deny the same. The Actavis Generic  
10 Entities deny the remaining allegations in Paragraph 685.

11           686. To the extent that the allegations in Paragraph 686 purport to be based on  
12 documents, including those referred to in footnotes 237, 238 and 239, those documents speak for  
13 themselves, and all characterizations thereof are denied. The Actavis Generic Entities are without  
14 knowledge or information sufficient to form a belief as to the truth of the remaining allegations of  
15 Paragraph 686 and therefore deny the same.

16           687. To the extent that the allegations in Paragraph 687 purport to be based on  
17 documents, including those referred to in footnote 240, those documents speak for themselves, and  
18 all characterizations thereof are denied. The Actavis Generic Entities are without knowledge or  
19 information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 687  
20 and therefore deny the same.

21           688. To the extent that the allegations in Paragraph 688 purport to be based on  
22 documents, including those referred to in footnotes 241, 242, 243 and 244, those documents speak  
23 for themselves, and all characterizations thereof are denied. The Actavis Generic Entities are  
24 without knowledge or information sufficient to form a belief as to the truth of the remaining  
25 allegations of Paragraph 688 and therefore deny the same.

26           689. To the extent that the allegations in Paragraph 689 purport to be based on documents  
27 and/or quotes, those documents speak for themselves, and all characterizations thereof are denied.

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1 The Actavis Generic Entities are without knowledge or information sufficient to form a belief as to  
2 the truth of the remaining allegations of Paragraph 689 and therefore deny the same.

3 690. To the extent that the allegations in Paragraph 690 purport to be based on  
4 documents, including those referred to in footnotes 245 and 246, those documents speak for  
5 themselves, and all characterizations thereof are denied. The Actavis Generic Entities are without  
6 knowledge or information sufficient to form a belief as to the truth of the remaining allegations of  
7 Paragraph 690 and therefore deny the same.

8 691. To the extent that the allegations in Paragraph 691 purport to be based on  
9 documents, including those referred to in footnotes 247 and 248, those documents speak for  
10 themselves, and all characterizations thereof are denied. The Actavis Generic Entities are without  
11 knowledge or information sufficient to form a belief as to the truth of the remaining allegations of  
12 Paragraph 691 and therefore deny the same.

13 692. To the extent that the allegations in Paragraph 692 purport to be based on  
14 documents, those documents speak for themselves, and all characterizations thereof are denied.  
15 The Actavis Generic Entities are without knowledge or information sufficient to form a belief as to  
16 the truth of the remaining allegations of Paragraph 692 and therefore deny the same.

17 693. To the extent that the allegations in Paragraph 693 purport to be based on  
18 documents, including those referred to in footnote 249, those documents speak for themselves, and  
19 all characterizations thereof are denied. The Actavis Generic Entities are without knowledge or  
20 information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 693  
21 and therefore deny the same.

22 694. To the extent that the allegations in Paragraph 694 purport to be based on documents  
23 and/or quotes, including those referred to in footnotes 250 and 251, those documents and/or quotes  
24 speak for themselves, and all characterizations thereof are denied. The Actavis Generic Entities  
25 are without knowledge or information sufficient to form a belief as to the truth of the remaining  
26 allegations of Paragraph 694 and therefore deny the same.

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1           695. To the extent that the allegations in Paragraph 695 purport to be based on documents  
2 and/or quotes, including those referred to in footnote 252, those documents and/or quotes speak for  
3 themselves, and all characterizations thereof are denied. The Actavis Generic Entities are without  
4 knowledge or information sufficient to form a belief as to the truth of the remaining allegations of  
5 Paragraph 695 and therefore deny the same.

6           696. To the extent that the allegations in Paragraph 696 purport to be based on documents  
7 and/or quotes, those documents and/or quotes speak for themselves, and all characterizations  
8 thereof are denied. The Actavis Generic Entities are without knowledge or information sufficient  
9 to form a belief as to the truth of the remaining allegations of Paragraph 696 and therefore deny the  
10 same.

11           697. The allegations in Paragraph 697 state argument and conclusions of law to which  
12 no response is required. To the extent that the allegations in Paragraph 697 relate to parties other  
13 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
14 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
15 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
16 allegations in Paragraph 697.

17           698. The allegations in Paragraph 698 state argument and conclusions of law to which  
18 no response is required. To the extent that the allegations in Paragraph 698 relate to parties other  
19 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
20 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
21 same. To the extent that the allegations in Paragraph 698 purport to be based on documents, those  
22 documents speak for themselves, and all characterizations thereof are denied. To the extent a  
23 response is required, the Actavis Generic Entities deny the remaining allegations in Paragraph 698.

24           699. The allegations in Paragraph 699 state argument and conclusions of law to which  
25 no response is required. To the extent that the allegations in Paragraph 699 relate to parties other  
26 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
27 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
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1 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
2 allegations in Paragraph 699.

3 700. The allegations in Paragraph 700 state argument and conclusions of law to which  
4 no response is required. To the extent that the allegations in Paragraph 700 relate to parties other  
5 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
6 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
7 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
8 allegations in Paragraph 700.

9 701. The allegations in Paragraph 701 state argument and conclusions of law to which  
10 no response is required. To the extent that the allegations in Paragraph 701 relate to parties other  
11 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
12 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
13 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
14 allegations in Paragraph 701.

15 702. The allegations in Paragraph 702 state argument and conclusions of law to which  
16 no response is required. To the extent that the allegations in Paragraph 702 relate to parties other  
17 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
18 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
19 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
20 allegations in Paragraph 702.

21 703. The allegations in Paragraph 703 state argument and conclusions of law to which  
22 no response is required. To the extent that the allegations in Paragraph 703 relate to parties other  
23 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
24 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
25 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
26 allegations in Paragraph 703.

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1           704. The allegations in Paragraph 704 state argument and conclusions of law to which  
2 no response is required. To the extent that the allegations in Paragraph 704 relate to parties other  
3 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
4 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
5 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
6 allegations in Paragraph 704.

7           705. The allegations in Paragraph 705 state argument and conclusions of law to which  
8 no response is required. To the extent that the allegations in Paragraph 705 relate to parties other  
9 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
10 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
11 same. To the extent that the allegations in Paragraph 705 purport to be based on documents, those  
12 documents speak for themselves, and all characterizations thereof are denied. To the extent a  
13 response is required, the Actavis Generic Entities deny the remaining allegations in Paragraph 705.

14           706. The allegations in Paragraph 706 state argument and conclusions of law to which  
15 no response is required. To the extent that the allegations in Paragraph 706 relate to parties other  
16 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
17 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
18 same. To the extent that the allegations in Paragraph 706 purport to be based on documents, those  
19 documents speak for themselves, and all characterizations thereof are denied. To the extent a  
20 response is required, the Actavis Generic Entities deny the remaining allegations in Paragraph 706.

21           707. The allegations in Paragraph 707 state argument and conclusions of law to which  
22 no response is required. To the extent that the allegations in Paragraph 707 relate to parties other  
23 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
24 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
25 same. To the extent that the allegations in Paragraph 707 purport to be based on documents, those  
26 documents speak for themselves, and all characterizations thereof are denied. To the extent a  
27 response is required, the Actavis Generic Entities deny the remaining allegations in Paragraph 707.

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1           708. The allegations in Paragraph 708 state argument and conclusions of law to which  
2 no response is required. To the extent that the allegations in Paragraph 708 relate to parties other  
3 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
4 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
5 same. To the extent that the allegations in Paragraph 708 purport to be based on documents, those  
6 documents speak for themselves, and all characterizations thereof are denied. To the extent a  
7 response is required, the Actavis Generic Entities deny the remaining allegations in Paragraph 708.

8           709. The allegations in Paragraph 709 state argument and conclusions of law to which  
9 no response is required. To the extent that the allegations in Paragraph 709 relate to parties other  
10 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
11 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
12 same. To the extent that the allegations in Paragraph 709 purport to be based on documents, those  
13 documents speak for themselves, and all characterizations thereof are denied. To the extent a  
14 response is required, the Actavis Generic Entities deny the remaining allegations in Paragraph 709.

15           710. The allegations in Paragraph 710 state argument and conclusions of law to which  
16 no response is required. To the extent that the allegations in Paragraph 710 relate to parties other  
17 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
18 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
19 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
20 allegations in Paragraph 710.

21           711. The allegations in Paragraph 711 state argument and conclusions of law to which  
22 no response is required. To the extent that the allegations in Paragraph 711 relate to parties other  
23 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
24 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
25 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
26 allegations in Paragraph 711.

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1           712. The allegations in Paragraph 712 state argument and conclusions of law to which  
2 no response is required. To the extent that the allegations in Paragraph 712 relate to parties other  
3 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
4 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
5 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
6 allegations in Paragraph 712.

7           713. The allegations in Paragraph 713 state argument and conclusions of law to which  
8 no response is required. To the extent that the allegations in Paragraph 713 relate to parties other  
9 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
10 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
11 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
12 allegations in Paragraph 713.

13           714. The allegations in Paragraph 714 state argument and conclusions of law to which  
14 no response is required. To the extent that the allegations in Paragraph 714 relate to parties other  
15 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
16 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
17 same. To the extent that the allegations in Paragraph 714 purport to be based on documents, those  
18 documents speak for themselves, and all characterizations thereof are denied. To the extent a  
19 response is required, the Actavis Generic Entities deny the remaining allegations in Paragraph 714.

20           715. The allegations in Paragraph 715 state argument and conclusions of law to which  
21 no response is required. To the extent that the allegations in Paragraph 715 relate to parties other  
22 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
23 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
24 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
25 allegations in Paragraph 715.

26           716. The allegations in Paragraph 716 state argument and conclusions of law to which  
27 no response is required. To the extent that the allegations in Paragraph 716 relate to parties other  
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1 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
2 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
3 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
4 allegations in Paragraph 716.

5 717. The allegations in Paragraph 717 state argument and conclusions of law to which  
6 no response is required. To the extent that the allegations in Paragraph 717 relate to parties other  
7 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
8 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
9 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
10 allegations in Paragraph 717.

11 718. The allegations in Paragraph 718 state argument and conclusions of law to which  
12 no response is required. To the extent that the allegations in Paragraph 718 relate to parties other  
13 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
14 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
15 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
16 allegations in Paragraph 718.

17 719. The allegations in Paragraph 719 state argument and conclusions of law to which  
18 no response is required. To the extent that the allegations in Paragraph 719 relate to parties other  
19 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
20 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
21 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
22 allegations in Paragraph 719.

23 720. The allegations in Paragraph 720 state argument and conclusions of law to which  
24 no response is required. To the extent that the allegations in Paragraph 720 relate to parties other  
25 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
26 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
27 same. To the extent that the allegations in Paragraph 720 purport to be based on statutes, laws or  
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1 regulations, those statutes, laws and regulations speak for themselves, and all characterizations  
2 thereof are denied. To the extent a response is required, the Actavis Generic Entities deny the  
3 remaining allegations in Paragraph 720.

4 721. The allegations in Paragraph 721 state argument and conclusions of law to which  
5 no response is required. To the extent that the allegations in Paragraph 721 relate to parties other  
6 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
7 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
8 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
9 allegations in Paragraph 721.

10 722. The allegations in Paragraph 722 state argument and conclusions of law to which  
11 no response is required. To the extent that the allegations in Paragraph 722 relate to parties other  
12 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
13 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
14 same. To the extent that the allegations in Paragraph 722 purport to be based on documents, those  
15 documents speak for themselves, and all characterizations thereof are denied. To the extent a  
16 response is required, the Actavis Generic Entities deny the remaining allegations in Paragraph 722.

17 723. The allegations in Paragraph 723 state argument and conclusions of law to which  
18 no response is required. To the extent that the allegations in Paragraph 723 relate to parties other  
19 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
20 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
21 same. To the extent that the allegations in Paragraph 723 purport to be based on documents, those  
22 documents speak for themselves, and all characterizations thereof are denied. To the extent a  
23 response is required, the Actavis Generic Entities deny the remaining allegations in Paragraph 723.

24 724. The allegations in Paragraph 724 state argument and conclusions of law to which  
25 no response is required. To the extent that the allegations in Paragraph 724 relate to parties other  
26 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
27 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
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1 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
2 allegations in Paragraph 724.

3 725. The allegations in Paragraph 725 state argument and conclusions of law to which  
4 no response is required. To the extent that the allegations in Paragraph 725 relate to parties other  
5 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
6 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
7 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
8 allegations in Paragraph 725.

9 726. The allegations in Paragraph 726 state argument and conclusions of law to which  
10 no response is required. To the extent that the allegations in Paragraph 726 relate to parties other  
11 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
12 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
13 same. To the extent that the allegations in Paragraph 726 purport to be based on documents, those  
14 documents speak for themselves, and all characterizations thereof are denied. To the extent a  
15 response is required, the Actavis Generic Entities deny the remaining allegations in Paragraph 726.

16 727. The allegations in Paragraph 727 state argument and conclusions of law to which  
17 no response is required. To the extent that the allegations in Paragraph 727 relate to parties other  
18 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
19 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
20 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
21 allegations in Paragraph 727.

22 728. The allegations in Paragraph 728 state argument and conclusions of law to which  
23 no response is required. To the extent that the allegations in Paragraph 728 relate to parties other  
24 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
25 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
26 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
27 allegations in Paragraph 728.

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1           729. The allegations in Paragraph 729 state argument and conclusions of law to which  
2 no response is required. To the extent that the allegations in Paragraph 729 relate to parties other  
3 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
4 information to form a belief as to the truth of the allegations and therefore deny the same. To the  
5 extent a response is required, the Actavis Generic Entities deny the remaining allegations of  
6 Paragraph 729.

7           730. The allegations in Paragraph 730 state argument and conclusions of law to which  
8 no response is required. To the extent that the allegations in Paragraph 730 relate to parties other  
9 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
10 information to form a belief as to the truth of the allegations and therefore deny the same. To the  
11 extent a response is required, the Actavis Generic Entities deny the remaining allegations of  
12 Paragraph 730.

13           731. The allegations in Paragraph 731 state argument and conclusions of law to which  
14 no response is required. To the extent that the allegations in Paragraph 731 relate to parties other  
15 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
16 information to form a belief as to the truth of the allegations and therefore deny the same. To the  
17 extent a response is required, the Actavis Generic Entities deny the remaining allegations of  
18 Paragraph 731.

19           732. The allegations in Paragraph 732 state argument and conclusions of law to which  
20 no response is required. To the extent that the allegations in Paragraph 732 relate to parties other  
21 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
22 information to form a belief as to the truth of the allegations and therefore deny the same. To the  
23 extent a response is required, the Actavis Generic Entities deny the remaining allegations of  
24 Paragraph 732.

25           733. The allegations in Paragraph 733 state argument and conclusions of law to which  
26 no response is required. To the extent that the allegations in Paragraph 733 relate to parties other  
27 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
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1 information to form a belief as to the truth of the allegations and therefore deny the same. To the  
2 extent a response is required, the Actavis Generic Entities deny the remaining allegations of  
3 Paragraph 733.

4 734. The allegations in Paragraph 734 are not directed to the Actavis Generic Entities  
5 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
6 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
7 and therefore deny the same.

8 735. The allegations in Paragraph 735 are not directed to the Actavis Generic Entities  
9 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
10 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
11 and therefore deny the same.

12 736. The allegations in Paragraph 736 are not directed to the Actavis Generic Entities  
13 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
14 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
15 and therefore deny the same.

16 737. The allegations in Paragraph 737 are not directed to the Actavis Generic Entities  
17 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
18 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
19 and therefore deny the same.

20 738. The allegations in Paragraph 738 are not directed to the Actavis Generic Entities  
21 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
22 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
23 and therefore deny the same.

24 739. The allegations in Paragraph 739 are not directed to the Actavis Generic Entities  
25 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
26 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
27 and therefore deny the same.

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1           740. The allegations in Paragraph 740 are not directed to the Actavis Generic Entities  
2 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
3 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
4 and therefore deny the same.

5           741. The allegations in Paragraph 741 are not directed to the Actavis Generic Entities  
6 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
7 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
8 and therefore deny the same.

9           742. The allegations in Paragraph 742 are not directed to the Actavis Generic Entities  
10 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
11 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
12 and therefore deny the same.

13           743. The allegations in Paragraph 743 are not directed to the Actavis Generic Entities  
14 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
15 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
16 and therefore deny the same.

17           744. To the extent that the allegations in Paragraph 744 relate to parties other than the  
18 Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information  
19 sufficient to form a belief as to the truth of those allegations and therefore deny the same. The  
20 Actavis Generic Entities deny the allegations of Paragraph 744.

21           745. The allegations in Paragraph 745 are not directed to the Actavis Generic Entities  
22 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
23 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
24 and therefore deny the same.

25           746. The allegations in Paragraph 746 are not directed to the Actavis Generic Entities  
26 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
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1 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
2 and therefore deny the same.

3 747. The allegations in Paragraph 747 are not directed to the Actavis Generic Entities  
4 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
5 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
6 and therefore deny the same.

7 748. The allegations in Paragraph 748 are not directed to the Actavis Generic Entities  
8 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
9 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
10 and therefore deny the same.

11 749. The allegations in Paragraph 749 are not directed to the Actavis Generic Entities  
12 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
13 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
14 and therefore deny the same.

15 750. The allegations in Paragraph 750 are not directed to the Actavis Generic Entities  
16 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
17 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
18 and therefore deny the same.

19 751. The allegations in Paragraph 751 are not directed to the Actavis Generic Entities  
20 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
21 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
22 and therefore deny the same.

23 752. The allegations in Paragraph 752 are not directed to the Actavis Generic Entities  
24 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
25 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
26 and therefore deny the same.

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1           753. The allegations in Paragraph 753 are not directed to the Actavis Generic Entities  
2 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
3 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
4 and therefore deny the same.

5           754. The allegations in Paragraph 754 are not directed to the Actavis Generic Entities  
6 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
7 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
8 and therefore deny the same.

9           755. The allegations in Paragraph 755 are not directed to the Actavis Generic Entities  
10 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
11 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
12 and therefore deny the same.

13           756. The allegations in Paragraph 756 are not directed to the Actavis Generic Entities  
14 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
15 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
16 and therefore deny the same.

17           757. The allegations in Paragraph 757 are not directed to the Actavis Generic Entities  
18 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
19 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
20 and therefore deny the same.

21           758. The allegations in Paragraph 758 are not directed to the Actavis Generic Entities  
22 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
23 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
24 and therefore deny the same.

25           759. The allegations in Paragraph 759 are not directed to the Actavis Generic Entities  
26 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
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1 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
2 and therefore deny the same.

3 760. The allegations in Paragraph 760 are not directed to the Actavis Generic Entities  
4 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
5 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
6 and therefore deny the same.

7 761. The allegations in Paragraph 761 state argument and conclusions of law to which  
8 no response is required. To the extent that the allegations in Paragraph 761 relate to parties other  
9 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
10 information to form a belief as to the truth of the allegations and therefore deny the same. To the  
11 extent a response is required, the Actavis Generic Entities deny the remaining allegations of  
12 Paragraph 761.

13 762. The allegations asserted in Paragraph 762 relate to claims dismissed by the Court  
14 and therefore no response is required. Further, the allegations in Paragraph 762 contain argument  
15 and conclusions of law to which no response is required. To the extent a response is required, the  
16 Actavis Generic Entities deny the allegations in Paragraph 762.

17 763. The allegations asserted in Paragraph 763 relate to claims dismissed by the Court  
18 and therefore no response is required. Further, the allegations in Paragraph 763 contain argument  
19 and conclusions of law to which no response is required. To the extent a response is required, the  
20 Actavis Generic Entities deny the allegations in Paragraph 763.

21 764. The allegations asserted in Paragraph 764 relate to claims dismissed by the Court  
22 and therefore no response is required. Further, the allegations in Paragraph 764 contain argument  
23 and conclusions of law to which no response is required. To the extent a response is required, the  
24 Actavis Generic Entities deny the allegations in Paragraph 764.

25 765. The allegations asserted in Paragraph 765 relate to claims dismissed by the Court  
26 and therefore no response is required. Further, the allegations in Paragraph 765 contain argument  
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1 and conclusions of law to which no response is required. To the extent a response is required, the  
2 Actavis Generic Entities deny the allegations in Paragraph 765.

3 766. The allegations asserted in Paragraph 766 relate to claims dismissed by the Court  
4 and therefore no response is required. Further, the allegations in Paragraph 766 contain argument  
5 and conclusions of law to which no response is required. To the extent a response is required, the  
6 Actavis Generic Entities deny the allegations in Paragraph 766.

7 767. The allegations asserted in Paragraph 767 relate to claims dismissed by the Court  
8 and therefore no response is required. Further, the allegations in Paragraph 767 contain argument  
9 and conclusions of law to which no response is required. To the extent a response is required, the  
10 Actavis Generic Entities deny the allegations in Paragraph 767.

11 768. The allegations asserted in Paragraph 768 relate to claims dismissed by the Court  
12 and therefore no response is required. Further, the allegations in Paragraph 768 contain argument  
13 and conclusions of law to which no response is required. To the extent a response is required, the  
14 Actavis Generic Entities deny the allegations in Paragraph 768.

15 769. The allegations asserted in Paragraph 769 relate to claims dismissed by the Court  
16 and therefore no response is required. Further, the allegations in Paragraph 769 contain argument  
17 and conclusions of law to which no response is required. To the extent a response is required, the  
18 Actavis Generic Entities deny the allegations in Paragraph 769.

19 770. The allegations asserted in Paragraph 770 relate to claims dismissed by the Court  
20 and therefore no response is required. Further, the allegations in Paragraph 770 contain argument  
21 and conclusions of law to which no response is required. To the extent a response is required, the  
22 Actavis Generic Entities deny the allegations in Paragraph 770.

23 771. The allegations asserted in Paragraph 771 relate to claims dismissed by the Court  
24 and therefore no response is required. Further, the allegations in Paragraph 771 contain argument  
25 and conclusions of law to which no response is required. To the extent a response is required, the  
26 Actavis Generic Entities deny the allegations in Paragraph 771.

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1           772. The allegations asserted in Paragraph 772 relate to claims dismissed by the Court  
2 and therefore no response is required. To the extent a response is required, the Actavis Generic  
3 Entities are without knowledge or information sufficient to form a belief as to the truth of those  
4 allegations and therefore denies the same.

5           773. The allegations asserted in Paragraph 773 relate to claims dismissed by the Court  
6 and therefore no response is required. To the extent a response is required, the Actavis Generic  
7 Entities are without knowledge or information sufficient to form a belief as to the truth of those  
8 allegations and therefore denies the same.

9           774. The allegations asserted in Paragraph 774 relate to claims dismissed by the Court  
10 and therefore no response is required. Further, the allegations in Paragraph 774 contain argument  
11 and conclusions of law to which no response is required. To the extent a response is required, the  
12 Actavis Generic Entities deny the allegations in Paragraph 774.

13           775. The allegations asserted in Paragraph 775 relate to claims dismissed by the Court  
14 and therefore no response is required. Further, the allegations in Paragraph 775 contain argument  
15 and conclusions of law to which no response is required. To the extent a response is required, the  
16 Actavis Generic Entities deny the allegations in Paragraph 775.

17           776. The allegations asserted in Paragraph 776 relate to claims dismissed by the Court  
18 and therefore no response is required. Further, the allegations in Paragraph 776 contain argument  
19 and conclusions of law to which no response is required. To the extent a response is required, the  
20 Actavis Generic Entities deny the allegations in Paragraph 776.

21           777. The allegations asserted in Paragraph 777 relate to claims dismissed by the Court  
22 and therefore no response is required. Further, the allegations in Paragraph 777 contain argument  
23 and conclusions of law to which no response is required. To the extent a response is required, the  
24 Actavis Generic Entities deny the allegations in Paragraph 777.

25           778. The allegations asserted in Paragraph 778 relate to claims dismissed by the Court  
26 and therefore no response is required. Further, the allegations in Paragraph 778 contain argument  
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1 and conclusions of law to which no response is required. To the extent a response is required, the  
2 Actavis Generic Entities deny the allegations in Paragraph 778.

3 779. The allegations asserted in Paragraph 779 relate to claims dismissed by the Court  
4 and therefore no response is required. Further, the allegations in Paragraph 779 contain argument  
5 and conclusions of law to which no response is required. To the extent a response is required, the  
6 Actavis Generic Entities deny the allegations in Paragraph 779.

7 780. The allegations asserted in Paragraph 780 relate to claims dismissed by the Court  
8 and therefore no response is required. To the extent a response is required, the Actavis Generic  
9 Entities deny the allegations in Paragraph 780.

10 781. The allegations asserted in Paragraph 781 relate to claims dismissed by the Court  
11 and therefore no response is required. Further, the allegations in Paragraph 781 contain argument  
12 and conclusions of law to which no response is required. To the extent a response is required, the  
13 Actavis Generic Entities deny the allegations in Paragraph 781.

14 782. The allegations asserted in Paragraph 782 relate to claims dismissed by the Court  
15 and therefore no response is required. Further, the allegations in Paragraph 782 contain argument  
16 and conclusions of law to which no response is required. To the extent a response is required, the  
17 Actavis Generic Entities deny the allegations in Paragraph 782.

18 783. The allegations asserted in Paragraph 783 relate to claims dismissed by the Court  
19 and therefore no response is required. Further, the allegations in Paragraph 783 contain argument  
20 and conclusions of law to which no response is required. To the extent a response is required, the  
21 Actavis Generic Entities deny the allegations in Paragraph 783.

22 784. The allegations asserted in Paragraph 784 relate to claims dismissed by the Court  
23 and therefore no response is required. Further, the allegations in Paragraph 784 contain argument  
24 and conclusions of law to which no response is required. To the extent a response is required, the  
25 Actavis Generic Entities deny the allegations in Paragraph 784.

26 785. The allegations asserted in Paragraph 785 relate to claims dismissed by the Court  
27 and therefore no response is required. Further, the allegations in Paragraph 785 contain argument  
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1 and conclusions of law to which no response is required. To the extent a response is required, the  
2 Actavis Generic Entities deny the allegations in Paragraph 785.

3 786. The allegations asserted in Paragraph 786 relate to claims dismissed by the Court  
4 and therefore no response is required. Further, the allegations in Paragraph 786 contain argument  
5 and conclusions of law to which no response is required. To the extent a response is required, the  
6 Actavis Generic Entities deny the allegations in Paragraph 786.

7 787. The allegations asserted in Paragraph 787 relate to claims dismissed by the Court  
8 and therefore no response is required. Further, the allegations in Paragraph 787 contain argument  
9 and conclusions of law to which no response is required. To the extent a response is required, the  
10 Actavis Generic Entities deny the allegations in Paragraph 787.

11 788. The allegations asserted in Paragraph 788 relate to claims dismissed by the Court  
12 and therefore no response is required. Further, the allegations in Paragraph 788 contain argument  
13 and conclusions of law to which no response is required. To the extent a response is required, the  
14 Actavis Generic Entities deny the allegations in Paragraph 788.

15 789. The allegations asserted in Paragraph 789 relate to claims dismissed by the Court  
16 and therefore no response is required. Further, the allegations in Paragraph 789 contain argument  
17 and conclusions of law to which no response is required. To the extent a response is required, the  
18 Actavis Generic Entities deny the allegations in Paragraph 789.

19 790. The allegations asserted in Paragraph 790 relate to claims dismissed by the Court  
20 and therefore no response is required. Further, the allegations in Paragraph 790 contain argument  
21 and conclusions of law to which no response is required. To the extent a response is required, the  
22 Actavis Generic Entities deny the allegations in Paragraph 790.

23 791. The allegations asserted in Paragraph 791 relate to claims dismissed by the Court  
24 and therefore no response is required. Further, the allegations in Paragraph 791 contain argument  
25 and conclusions of law to which no response is required. To the extent a response is required, the  
26 Actavis Generic Entities deny the allegations in Paragraph 791.

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1           792. The allegations asserted in Paragraph 792 relate to claims dismissed by the Court  
2 and therefore no response is required. Further, the allegations in Paragraph 792 contain argument  
3 and conclusions of law to which no response is required. To the extent a response is required, the  
4 Actavis Generic Entities deny the allegations in Paragraph 792.

5           793. The allegations asserted in Paragraph 793 relate to claims dismissed by the Court  
6 and therefore no response is required. Further, the allegations in Paragraph 793 contain argument  
7 and conclusions of law to which no response is required. To the extent a response is required, the  
8 Actavis Generic Entities deny the allegations in Paragraph 793.

9           794. The allegations asserted in Paragraph 794 relate to claims dismissed by the Court  
10 and therefore no response is required. Further, the allegations in Paragraph 794 contain argument  
11 and conclusions of law to which no response is required. To the extent a response is required, the  
12 Actavis Generic Entities deny the allegations in Paragraph 794.

13           795. The allegations asserted in Paragraph 795 relate to claims dismissed by the Court  
14 and therefore no response is required. Further, the allegations in Paragraph 795 contain argument  
15 and conclusions of law to which no response is required. To the extent a response is required, the  
16 Actavis Generic Entities deny the allegations in Paragraph 795.

17           796. The allegations asserted in Paragraph 796 relate to claims dismissed by the Court  
18 and therefore no response is required. Further, the allegations in Paragraph 796 contain argument  
19 and conclusions of law to which no response is required. To the extent a response is required, the  
20 Actavis Generic Entities deny the allegations in Paragraph 796.

21           797. The allegations asserted in Paragraph 797 relate to claims dismissed by the Court  
22 and therefore no response is required. Further, the allegations in Paragraph 797 contain argument  
23 and conclusions of law to which no response is required. To the extent a response is required, the  
24 Actavis Generic Entities deny the allegations in Paragraph 797.

25           798. The allegations asserted in Paragraph 798 relate to claims dismissed by the Court  
26 and therefore no response is required. Further, the allegations in Paragraph 798 contain argument  
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1 and conclusions of law to which no response is required. To the extent a response is required, the  
2 Actavis Generic Entities deny the allegations in Paragraph 798.

3 799. The allegations asserted in Paragraph 799 relate to claims dismissed by the Court  
4 and therefore no response is required. Further, the allegations in Paragraph 799 contain argument  
5 and conclusions of law to which no response is required. To the extent a response is required, the  
6 Actavis Generic Entities deny the allegations in Paragraph 799.

7 800. The allegations asserted in Paragraph 800 relate to claims dismissed by the Court  
8 and therefore no response is required. Further, the allegations in Paragraph 800 contain argument  
9 and conclusions of law to which no response is required. To the extent a response is required, the  
10 Actavis Generic Entities deny the allegations in Paragraph 800.

11 801. The allegations asserted in Paragraph 801 relate to claims dismissed by the Court  
12 and therefore no response is required. Further, the allegations in Paragraph 801 contain argument  
13 and conclusions of law to which no response is required. To the extent a response is required, the  
14 Actavis Generic Entities deny the allegations in Paragraph 801.

15 802. The allegations asserted in Paragraph 802 relate to claims dismissed by the Court  
16 and therefore no response is required. Further, the allegations in Paragraph 802 contain argument  
17 and conclusions of law to which no response is required. To the extent a response is required, the  
18 Actavis Generic Entities deny the allegations in Paragraph 802.

19 803. The allegations asserted in Paragraph 803 relate to claims dismissed by the Court  
20 and therefore no response is required. Further, the allegations in Paragraph 803 contain argument  
21 and conclusions of law to which no response is required. To the extent a response is required, the  
22 Actavis Generic Entities deny the allegations in Paragraph 803.

23 804. The allegations asserted in Paragraph 804 relate to claims dismissed by the Court  
24 and therefore no response is required. Further, the allegations in Paragraph 804 contain argument  
25 and conclusions of law to which no response is required. To the extent a response is required, the  
26 Actavis Generic Entities deny the allegations in Paragraph 804.

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1           805. The allegations asserted in Paragraph 805 relate to claims dismissed by the Court  
2 and therefore no response is required. To the extent a response is required, the Actavis Generic  
3 Entities deny the allegations in Paragraph 805.

4           806. The allegations asserted in Paragraph 806 relate to claims dismissed by the Court  
5 and therefore no response is required. Further, the allegations in Paragraph 806 contain argument  
6 and conclusions of law to which no response is required. To the extent a response is required, the  
7 Actavis Generic Entities deny the allegations in Paragraph 806.

8           807. The allegations asserted in Paragraph 807 relate to claims dismissed by the Court  
9 and therefore no response is required. Further, the allegations in Paragraph 807 contain argument  
10 and conclusions of law to which no response is required. To the extent a response is required, the  
11 Actavis Generic Entities deny the allegations in Paragraph 807.

12           808. The allegations asserted in Paragraph 808 relate to claims dismissed by the Court  
13 and therefore no response is required. Further, the allegations in Paragraph 808 contain argument  
14 and conclusions of law to which no response is required. To the extent a response is required, the  
15 Actavis Generic Entities deny the allegations in Paragraph 808.

16           809. The allegations asserted in Paragraph 809 relate to claims dismissed by the Court  
17 and therefore no response is required. Further, the allegations in Paragraph 809 contain argument  
18 and conclusions of law to which no response is required. To the extent a response is required, the  
19 Actavis Generic Entities deny the allegations in Paragraph 809.

20           810. The allegations asserted in Paragraph 810 relate to claims dismissed by the Court  
21 and therefore no response is required. Further, the allegations in Paragraph 810 contain argument  
22 and conclusions of law to which no response is required. To the extent a response is required, the  
23 Actavis Generic Entities deny the allegations in Paragraph 810.

24           811. The allegations asserted in Paragraph 811 relate to claims dismissed by the Court  
25 and therefore no response is required. Further, the allegations in Paragraph 811 contain argument  
26 and conclusions of law to which no response is required. To the extent a response is required, the  
27 Actavis Generic Entities deny the allegations in Paragraph 811.

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1           812. The allegations asserted in Paragraph 812 relate to claims dismissed by the Court  
2 and therefore no response is required. Further, the allegations in Paragraph 812 contain argument  
3 and conclusions of law to which no response is required. To the extent a response is required, the  
4 Actavis Generic Entities deny the allegations in Paragraph 812.

5           813. The allegations asserted in Paragraph 813 relate to claims dismissed by the Court  
6 and therefore no response is required. Further, the allegations in Paragraph 813 contain argument  
7 and conclusions of law to which no response is required. To the extent a response is required, the  
8 Actavis Generic Entities deny the allegations in Paragraph 813.

9           814. The allegations asserted in Paragraph 814 relate to claims dismissed by the Court  
10 and therefore no response is required. Further, the allegations in Paragraph 814 contain argument  
11 and conclusions of law to which no response is required. To the extent a response is required, the  
12 Actavis Generic Entities deny the allegations in Paragraph 814.

13           815. The allegations asserted in Paragraph 815 relate to claims dismissed by the Court  
14 and therefore no response is required. Further, the allegations in Paragraph 815 contain argument  
15 and conclusions of law to which no response is required. To the extent a response is required, the  
16 Actavis Generic Entities deny the allegations in Paragraph 815.

17           816. The allegations asserted in Paragraph 816 relate to claims dismissed by the Court  
18 and therefore no response is required. To the extent a response is required, the Actavis Generic  
19 Entities deny the allegations in Paragraph 816.

20           817. The allegations asserted in Paragraph 817 relate to claims dismissed by the Court  
21 and therefore no response is required. Further, the allegations in Paragraph 817 contain argument  
22 and conclusions of law to which no response is required. To the extent a response is required, the  
23 Actavis Generic Entities deny the allegations in Paragraph 817.

24           818. The allegations asserted in Paragraph 818 relate to claims dismissed by the Court  
25 and therefore no response is required. Further, the allegations in Paragraph 818 contain argument  
26 and conclusions of law to which no response is required. To the extent a response is required, the  
27 Actavis Generic Entities deny the allegations in Paragraph 818.

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1           819. The allegations asserted in Paragraph 819 relate to claims dismissed by the Court  
2 and therefore no response is required. Further, the allegations in Paragraph 819 contain argument  
3 and conclusions of law to which no response is required. To the extent a response is required, the  
4 Actavis Generic Entities deny the allegations in Paragraph 819.

5           820. The allegations asserted in Paragraph 820 relate to claims dismissed by the Court  
6 and therefore no response is required. Further, the allegations in Paragraph 820 contain argument  
7 and conclusions of law to which no response is required. To the extent a response is required, the  
8 Actavis Generic Entities deny the allegations in Paragraph 820.

9           821. The allegations asserted in Paragraph 821 relate to claims dismissed by the Court  
10 and therefore no response is required. Further, the allegations in Paragraph 821 contain argument  
11 and conclusions of law to which no response is required. To the extent a response is required, the  
12 Actavis Generic Entities deny the allegations in Paragraph 821.

13           822. The allegations asserted in Paragraph 822 relate to claims dismissed by the Court  
14 and therefore no response is required. Further, the allegations in Paragraph 822 contain argument  
15 and conclusions of law to which no response is required. To the extent a response is required, the  
16 Actavis Generic Entities deny the allegations in Paragraph 822.

17           823. The allegations asserted in Paragraph 823 relate to claims dismissed by the Court  
18 and therefore no response is required. Further, the allegations in Paragraph 823 contain argument  
19 and conclusions of law to which no response is required. To the extent a response is required, the  
20 Actavis Generic Entities deny the allegations in Paragraph 823.

21           824. The allegations asserted in Paragraph 824 relate to claims dismissed by the Court  
22 and therefore no response is required. Further, the allegations in Paragraph 824 contain argument  
23 and conclusions of law to which no response is required. To the extent a response is required, the  
24 Actavis Generic Entities deny the allegations in Paragraph 824.

25           825. The allegations asserted in Paragraph 825 relate to claims dismissed by the Court  
26 and therefore no response is required. Further, the allegations in Paragraph 825 contain argument  
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1 and conclusions of law to which no response is required. To the extent a response is required, the  
2 Actavis Generic Entities deny the allegations in Paragraph 825.

3 826.-885. Pursuant to the Court’s September 30, 2020 Order, Plaintiffs’ RICO claims are  
4 dismissed. Thus, no response is required to Paragraphs 826 through 885. To the extent a response  
5 is required, those allegations are denied.

6 **COUNT III – BY THE PEOPLE OF THE STATE OF CALIFORNIA**  
7 **Public Nuisance in San Francisco**  
8 **Violations of California Civil Code §§3479-3480**  
9 **(Against All Defendants)**

10 886. The Actavis Generic Entities reassert its responses to Paragraphs 1 through 885 and  
11 incorporates by reference its responses to all other Paragraphs of the Complaint with the same legal  
12 force and effect as if fully set forth herein.

13 887. The allegations in Paragraph 887 purport to be based on statutes, laws or regulations,  
14 that speak for themselves, and all characterizations thereof are denied.

15 888. The allegations in Paragraph 888 purport to be based on statutes, laws or regulations,  
16 that speak for themselves, and all characterizations thereof are denied.

17 889. The allegations in Paragraph 889 purport to be based on statutes, laws or regulations,  
18 that speak for themselves, and all characterizations thereof are denied.

19 890. The allegations in Paragraph 890 purport to be based on statutes, laws or regulations,  
20 that speak for themselves, and all characterizations thereof are denied.

21 891. The allegations in Paragraph 891 purport to be based on statutes, laws or regulations,  
22 that speak for themselves, and all characterizations thereof are denied.

23 892. The allegations in Paragraph 892 state argument and conclusions of law to which  
24 no response is required. To the extent that the allegations in Paragraph 892 relate to parties other  
25 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
26 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
27 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
28 allegations in Paragraph 892.

1           893. The allegations in Paragraph 893 state argument and conclusions of law to which  
2 no response is required. To the extent that the allegations in Paragraph 893 relate to parties other  
3 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
4 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
5 same. To the extent that the allegations in Paragraph 893 purport to be based on statutes, laws or  
6 regulations, those statutes, laws and regulations speak for themselves, and all characterizations  
7 thereof are denied. To the extent a response is required, the Actavis Generic Entities deny the  
8 remaining allegations in Paragraph 893.

9           894. The allegations in Paragraph 894 are not directed to the Actavis Generic Entities  
10 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
11 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
12 and therefore deny the same.

13           895. The allegations in Paragraph 895 state argument and conclusions of law to which  
14 no response is required. To the extent that the allegations in Paragraph 895 relate to parties other  
15 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
16 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
17 same. To the extent that the allegations in Paragraph 895 purport to be based on statutes, laws or  
18 regulations, those statutes, laws and regulations speak for themselves, and all characterizations  
19 thereof are denied. To the extent a response is required, the Actavis Generic Entities deny the  
20 remaining allegations in Paragraph 895.

21           896. The allegations in Paragraph 896 are not directed to the Actavis Generic Entities  
22 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
23 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
24 and therefore deny the same.

25           897. The allegations in Paragraph 897 are not directed to the Actavis Generic Entities  
26 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
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1 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
2 and therefore deny the same.

3 898. The allegations in Paragraph 898 state argument and conclusions of law to which  
4 no response is required. To the extent that the allegations in Paragraph 898 relate to parties other  
5 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
6 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
7 same. To the extent that the allegations in Paragraph 898 purport to be based on statutes, laws or  
8 regulations, those statutes, laws and regulations speak for themselves, and all characterizations  
9 thereof are denied. To the extent a response is required, the Actavis Generic Entities deny the  
10 remaining allegations in Paragraph 898.

11 899. The allegations in Paragraph 899 state argument and conclusions of law to which  
12 no response is required. To the extent that the allegations in Paragraph 899 relate to parties other  
13 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
14 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
15 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
16 allegations in Paragraph 899.

17 900. The allegations in Paragraph 900 state argument and conclusions of law to which  
18 no response is required. To the extent that the allegations in Paragraph 900 relate to parties other  
19 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
20 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
21 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
22 allegations in Paragraph 900.

23 901. The allegations in Paragraph 901 state argument and conclusions of law to which  
24 no response is required. To the extent that the allegations in Paragraph 901 relate to parties other  
25 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
26 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
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1 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
2 allegations in Paragraph 901.

3 902. The allegations in Paragraph 902 state argument and conclusions of law to which  
4 no response is required. To the extent that the allegations in Paragraph 902 relate to parties other  
5 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
6 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
7 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
8 allegations in Paragraph 902.

9 903. The allegations in Paragraph 903 state argument and conclusions of law to which  
10 no response is required. To the extent that the allegations in Paragraph 903 relate to parties other  
11 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
12 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
13 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
14 allegations in Paragraph 903.

15 904. The allegations in Paragraph 904 state argument and conclusions of law to which  
16 no response is required. To the extent that the allegations in Paragraph 904 relate to parties other  
17 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
18 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
19 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
20 allegations in Paragraph 904.

21 905. The Actavis Generic Entities admit that Plaintiffs seek the relief listed in Paragraph  
22 905, but deny that its conduct caused or contributed to Plaintiffs' alleged injuries and deny that it  
23 is liable to Plaintiffs for damages or any other relief sought in the Complaint.

24 906. The Actavis Generic Entities admit that Plaintiffs seek the relief listed in Paragraph  
25 906, but deny that its conduct caused or contributed to Plaintiffs' alleged injuries and deny that it  
26 is liable to Plaintiffs for damages or any other relief sought in the Complaint.

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**COUNT IV – BY THE PEOPLE OF THE STATE OF CALIFORNIA  
Violation of California Unfair Competition Law Cal. Bus. & Prof. Code §17200 *et seq.*  
(Against All Defendants Except Walgreens)**

907. The Actavis Generic Entities reassert its responses to Paragraphs 1 through 906 and incorporate by reference its responses to all other Paragraphs of the Complaint with the same legal force and effect as if fully set forth herein.

908. The allegations in Paragraph 908 purport to be based on statutes, laws or regulations that speak for themselves, and all characterizations thereof are denied.

909. The allegations in Paragraph 909 state argument and conclusions of law to which no response is required. To the extent that the allegations in Paragraph 909 purport to be based on statutes, laws or regulations, those statutes, laws and regulations speak for themselves, and all characterizations thereof are denied. To the extent a response is required, the Actavis Generic Entities deny the remaining allegations in Paragraph 909.

910. The allegations in Paragraph 910 state argument and conclusions of law to which no response is required. To the extent that the allegations in Paragraph 910 relate to parties other than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the extent that the allegations in Paragraph 910 purport to be based on statutes, laws or regulations, those statutes, laws and regulations speak for themselves, and all characterizations thereof are denied. To the extent a response is required, the Actavis Generic Entities deny the remaining allegations in Paragraph 910.

911. The allegations in Paragraph 911 state argument and conclusions of law to which no response is required. To the extent that the allegations in Paragraph 911 relate to parties other than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or information sufficient to form a belief as to the truth of those allegations and therefore deny the same. To the extent a response is required, the Actavis Generic Entities deny the remaining allegations in Paragraph 911.

1           912. The allegations in Paragraph 912 state argument and conclusions of law to which  
2 no response is required. To the extent that the allegations in Paragraph 912 relate to parties other  
3 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
4 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
5 same. To the extent that the allegations in Paragraph 912 purport to be based on statutes, laws or  
6 regulations, those statutes, laws and regulations speak for themselves, and all characterizations  
7 thereof are denied. To the extent a response is required, the Actavis Generic Entities deny the  
8 remaining allegations in Paragraph 912.

9           913. The allegations in Paragraph 913 are not directed to the Actavis Generic Entities  
10 and, thus, no response is required. To the extent a response is required, the Actavis Generic Entities  
11 are without knowledge or information sufficient to form a belief as to the truth of those allegations  
12 and therefore deny the same.

13           914. The allegations in Paragraph 914 state argument and conclusions of law to which  
14 no response is required. To the extent that the allegations in Paragraph 914 relate to parties other  
15 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
16 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
17 same. To the extent that the allegations in Paragraph 914 purport to be based on statutes, laws or  
18 regulations, those statutes, laws and regulations speak for themselves, and all characterizations  
19 thereof are denied. To the extent a response is required, the Actavis Generic Entities deny the  
20 remaining allegations in Paragraph 914.

21           915. The allegations in Paragraph 915 state argument and conclusions of law to which  
22 no response is required. To the extent that the allegations in Paragraph 915 relate to parties other  
23 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
24 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
25 same. To the extent that the allegations in Paragraph 915 purport to be based on statutes, laws or  
26 regulations, those statutes, laws and regulations speak for themselves, and all characterizations  
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1 thereof are denied. To the extent a response is required, the Actavis Generic Entities deny the  
2 remaining allegations in Paragraph 915.

3 916. The allegations in Paragraph 916 state argument and conclusions of law to which  
4 no response is required. To the extent that the allegations in Paragraph 916 relate to parties other  
5 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
6 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
7 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
8 allegations in Paragraph 916.

9 917. The allegations in Paragraph 917 state argument and conclusions of law to which  
10 no response is required. To the extent that the allegations in Paragraph 917 relate to parties other  
11 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
12 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
13 same. To the extent a response is required, the Actavis Generic Entities deny the remaining  
14 allegations in Paragraph 917.

15 918. The allegations in Paragraph 918 state argument and conclusions of law to which  
16 no response is required. To the extent that the allegations in Paragraph 918 relate to parties other  
17 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
18 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
19 same. To the extent that the allegations in Paragraph 918 purport to be based on statutes, laws or  
20 regulations, those statutes, laws and regulations speak for themselves, and all characterizations  
21 thereof are denied. To the extent a response is required, the Actavis Generic Entities deny the  
22 remaining allegations in Paragraph 918.

23 919. The allegations in Paragraph 919 state argument and conclusions of law to which  
24 no response is required. To the extent that the allegations in Paragraph 919 relate to parties other  
25 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
26 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
27 same. To the extent that the allegations in Paragraph 919 purport to be based on statutes, laws or  
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1 regulations, those statutes, laws and regulations speak for themselves, and all characterizations  
2 thereof are denied. To the extent a response is required, the Actavis Generic Entities deny that its  
3 conduct caused or contributed to Plaintiffs’ alleged injuries and deny that it is liable to Plaintiffs  
4 for damages or any other relief sought in the Complaint.

5 **COUNT V – BY THE PEOPLE OF THE STATE OF CALIFORNIA**  
6 **Violation of False Advertising Law Cal. Bus. & Prof. Code §17500 et seq.**  
7 **(Against the Marketing Defendants)**

8 920. The Actavis Generic Entities reassert its responses to Paragraphs 1 through 919 and  
9 incorporate by reference its responses to all other Paragraphs of the Complaint with the same legal  
10 force and effect as if fully set forth herein.

11 921. The allegations in Paragraph 921 purport to be based on statutes, laws or regulations,  
12 that speak for themselves, and all characterizations thereof are denied.

13 922. The allegations in Paragraph 922 state argument and conclusions of law to which  
14 no response is required. To the extent that the allegations in Paragraph 922 purport to be based on  
15 statutes, laws or regulations, those statutes, laws and regulations speak for themselves, and all  
16 characterizations thereof are denied. To the extent a response is required, the Actavis Generic  
17 Entities deny the remaining allegations in Paragraph 922.

18 923. The allegations in Paragraph 923 state argument and conclusions of law to which  
19 no response is required. To the extent that the allegations in Paragraph 923 purport to be based on  
20 statutes, laws or regulations, those statutes, laws and regulations speak for themselves, and all  
21 characterizations thereof are denied. To the extent a response is required, the Actavis Generic  
22 Entities deny the remaining allegations in Paragraph 923.

23 924. The allegations in Paragraph 924 state argument and conclusions of law to which  
24 no response is required. To the extent that the allegations in Paragraph 924 relate to parties other  
25 than the Actavis Generic Entities, the Actavis Generic Entities are without knowledge or  
26 information sufficient to form a belief as to the truth of those allegations and therefore deny the  
27 same. The Actavis Generic Entities deny the remaining allegations in Paragraph 924.

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1 regulations.

2 **FOURTH.** Any claims pertaining to generic medicines are preempted, as set forth in the  
3 United States Supreme Court’s decisions in *PLIVA, Inc. v. Mensing*, 564 U.S. 604 (2011) and  
4 *Mutual Pharmaceuticals Co. v. Bartlett*, 570 U.S. 472 (2013).

5 **FIFTH.** The claims asserted in the Complaint against the Actavis Generic Entities are  
6 barred, in whole or in part, by the FDA-approved TIRF REMS Program, including, but not limited  
7 to, the requirements imposed on prescribers of TIRF medicines and patients.

8 **SIXTH.** Plaintiffs’ claims are barred, in whole or in part, under the learned intermediary  
9 doctrine because adequate warnings were given to learned intermediaries.

10 **SEVENTH.** Plaintiffs’ claims are barred, in whole or in part, to the extent they are based  
11 on alleged harms resulting from known risks or dangers associated with opioid products that are  
12 unavoidable even within the scope of prescribed and intended use, but that are reasonable in  
13 comparison to the benefits conferred.

14 **EIGHTH.** Plaintiffs’ claims are barred, reduced and/or limited pursuant to the California  
15 constitutional and statutory limitations on the power of counties and are barred, reduced and/or  
16 limited pursuant to other applicable statutory and common law regarding limitations of awards,  
17 caps on recovery, and setoffs.

18 **NINTH.** If Plaintiffs have sustained any injuries or damages, such were the result of  
19 intervening or superseding events, factors, occurrences, or conditions, which were not reasonably  
20 foreseeable and in no way caused by the Actavis Generic Entities and for which the Actavis  
21 Generic Entities are not liable.

22 **TENTH.** The alleged injury asserted by Plaintiffs is too remote from the alleged conduct  
23 of the Actavis Generic Entities to be a basis for liability as a matter of law and to satisfy  
24 principles of due process and proximate causation.

25 **ELEVENTH.** Plaintiffs may not recover from the Actavis Generic Entities because the  
26 methods, standards, or techniques of designing, manufacturing, labeling and distributing of the  
27 prescription medications at issue complied with and were in conformity with the generally  
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1 recognized state of the art at the time the product was designed, manufactured, labeled, and  
2 distributed.

3 **TWELFTH.** Plaintiffs' claims are barred, in whole or in part, by the applicable statutes of  
4 limitations and of repose.

5 **THIRTEENTH.** Plaintiffs' claims are barred, in whole or in part, by doctrines of laches,  
6 waiver, unclean hands, estoppel, release, and/or ratification.

7 **FOURTEENTH.** To the extent that Plaintiffs' claims relate to the Actavis Generic  
8 Entities' advertising, public statements, lobbying, or other activities protected by the First  
9 Amendment to the Constitution of the United States or by the Constitution of the State of California  
10 or that of any other state whose laws may apply, such claims are barred.

11 **FIFTEENTH.** Plaintiffs' claims are barred, in whole or in part, by Plaintiffs' failure to  
12 mitigate any damages allegedly sustained.

13 **SIXTEENTH.** Plaintiffs' claims are barred, in whole or in part, by the voluntary payment  
14 doctrine.

15 **SEVENTEENTH.** Any verdict or judgment that might be recovered by Plaintiffs must be  
16 reduced by those amounts that have already or will in the future indemnify Plaintiffs in whole or in  
17 part for any past or future claimed economic loss from any collateral source, such as insurance,  
18 social security, workers' compensation, taxes, or employee benefit program.

19 **EIGHTEENTH.** Plaintiffs' injuries and damages, if any, are barred in whole or in part by  
20 the actions, omissions, and/or conduct of third parties over whom the Actavis Generic Entities had  
21 no control or authority and, thus, any recovery should be reduced or barred by such parties'  
22 proportionate fault.

23 **NINETEENTH.** Plaintiffs' claims are barred and/or reduced by contributory or  
24 comparative negligence and contributory or comparative fault.

25 **TWENTIETH.** Plaintiffs' claims are barred, in whole or in part, by any alteration,  
26 modification, or misuse of the prescribed medications by Plaintiffs, prescribing providers, patients,  
27 or any other third parties, for which the Actavis Generic Entities cannot be held responsible.

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1           **TWENTY-FIRST.** Plaintiffs' claims for punitive or exemplary damages or other civil  
2 penalties are barred or reduced by applicable law or statute, including but not limited to Cal. Civ.  
3 Code Section 3294, or, in the alternative, are unconstitutional insofar as they violate the due process  
4 protections afforded by Art. I, Section 7 of the California Constitution, the United States  
5 Constitution, the excessive fines clause of the Eighth Amendment of the United States Constitution,  
6 the Full Faith and Credit Clause of the United States Constitution, the constitutional prohibitions  
7 against bills of attainder or application of ex post facto quasi-criminal punishment in violation of  
8 the Ex Post Facto Clause of the United States Constitution, and any other applicable provisions of  
9 the Constitution of this State or that of any other state whose laws may apply. Any law, statute or  
10 other authority purporting to permit the recovery of punitive damages or civil penalties in this case  
11 is unconstitutional, facially and as applied, to the extent that, without limitation, it: (1) lacks  
12 constitutionally sufficient standards to guide and restrain the jury's discretion in determining  
13 whether to award punitive damages or civil penalties and/or the amount, if any; (2) is void for  
14 vagueness in that it fails to provide adequate advance notice as to what conduct will result in  
15 punitive damages or civil penalties; (3) unconstitutionally may permit recovery of punitive damages  
16 or civil penalties based on harms to third parties, out-of-state conduct, conduct that complied with  
17 applicable law, or conduct that was not directed, or did not proximately cause harm, to Plaintiffs;  
18 (4) unconstitutionally may permit recovery of punitive damages or civil penalties in an amount that  
19 is not both reasonable and proportionate to the amount of harm, if any, to Plaintiffs and to the  
20 amount of compensatory damages, if any; (5) unconstitutionally may permit jury consideration of  
21 net worth or other financial information relating to the Actavis Generic Entities; (6) lacks  
22 constitutionally sufficient standards to be applied by the trial court in post-verdict review of any  
23 award of punitive damages or civil penalties; (7) lacks constitutionally sufficient standards for  
24 appellate review of any award of punitive damages or civil penalties; (8) would unconstitutionally  
25 impose a penalty, criminal in nature, without according to the Actavis Generic Entities the same  
26 procedural protections that are accorded to criminal defendants under the constitutions of the  
27 United States, this State, and any other state whose laws may apply; and (9) otherwise fails to  
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1 satisfy Supreme Court precedent, including, without limitation, *Pacific Mutual Life Insurance Co.*  
2 *v. Haslip*, 499 U.S. 1 (1991); *TXO Production Corp. v. Alliance Res., Inc.*, 509 U.S. 443 (1993);  
3 *BMW of North America v. Gore*, 517 U.S. 559 (1996); *State Farm Insurance Co. v. Campbell*, 538  
4 U.S. 408 (2003); and *Philip Morris USA v. Williams*, 549 U.S. 346 (2007).

5 **TWENTY-SECOND.** Plaintiffs' injuries and damages, if any, were due to illicit or  
6 improper use, misuse or abuse of the prescription medications at issue by the users, for which the  
7 Actavis Generic Entities are not liable.

8 **TWENTY-THIRD.** Plaintiffs' claims or damages are invalid and/or are barred, in whole  
9 or in part, because the users of the medications at issue used them after acknowledging and/or  
10 learning of their alleged risks.

11 **TWENTY-FOURTH.** To the extent that Plaintiffs are alleging fraud, fraudulent  
12 concealment, or similar conduct, Plaintiffs have failed to plead fraud with sufficient particularity.

13 **TWENTY-FIFTH.** The Actavis Generic Entities' liability, if any, will not result from its  
14 conduct but is solely the result of an obligation imposed by law, and thus the Actavis Generic  
15 Entities are entitled to complete indemnity, express or implied, by other parties.

16 **TWENTY-SIXTH.** Plaintiffs' injuries and damages, if any, were due to preexisting  
17 conditions, idiosyncratic reactions, or other responses to the medications on the part of the  
18 medication users, for which the Actavis Generic Entities cannot be held responsible.

19 **TWENTY-SEVENTH.** Should the Actavis Generic Entities be held liable to Plaintiffs,  
20 which liability is specifically denied, the Actavis Generic Entities would be entitled to a set-off for  
21 all sums of money received or available from or on behalf of any tortfeasor(s) for the same injuries  
22 alleged in Plaintiffs' Complaint.

23 **TWENTY-EIGHTH.** Plaintiffs lack standing to bring their claims.

24 **TWENTY-NINTH.** The Actavis Generic Entities are entitled to, and claims the benefit of,  
25 all defenses and presumptions set forth in or arising from Art. I, Section 7 of the California  
26 Constitution, any other rule of law or statute of this State or any other state whose substantive law  
27 might control the action.

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1           **THIRTIETH.** Plaintiffs’ claims violate the Supremacy Clause of the United States  
2 Constitution.

3           **THIRTY-FIRST.** Plaintiffs’ claims may be barred, in whole or in part, because neither  
4 users nor prescribers relied to their detriment upon any statement by the Actavis Generic Entities  
5 in determining to use the medications at issue, particularly given the TIRF REMS Access Program,  
6 required by the FDA, that mandates prescriber enrollment in order to prescribe TIRF medicines.

7           **THIRTY-SECOND.** Plaintiffs’ claims are barred, in whole or in part, by the deference  
8 that common law gives to discretionary actions by the FDA under the FDCA.

9           **THIRTY-THIRD.** To the extent Plaintiffs assert claims that depend solely on violations  
10 of federal law, including any claims of a “fraud on the FDA” with respect to the Actavis Generic  
11 Entities’ disclosure of information related to the safety of its medications at issue, such claims are  
12 barred and should be dismissed. *See Buckman v. Plaintiffs’ Legal Comm.*, 531 U.S. 341 (2001).

13           **THIRTY-FOURTH.** Plaintiffs’ claims are barred because the conduct of the Actavis  
14 Generic Entities conformed with the FDCA, the requirements of the FDA, the Controlled  
15 Substances Act, and the requirements of the DEA. Moreover, the activities of the Actavis Generic  
16 Entities alleged in the Complaint conformed with all state and federal statutes, regulations, and  
17 industry standards based upon the state of knowledge existing at the relevant time(s) alleged in the  
18 Complaint.

19           **THIRTY-FIFTH.** Plaintiffs fail to plead and cannot establish that they incurred any costs  
20 for any opioid prescription promoted or sold by the Actavis Generic Entities and that was medically  
21 inappropriate or should not have been written, or that the Actavis Generic Entities’ allegedly  
22 improper conduct caused any health care provider to write any unnecessary, ineffective or harmful  
23 opioid prescriptions.

24           **THIRTY-SIXTH.** Any statements in branded or unbranded materials that Plaintiffs seek  
25 to attribute to the Actavis Generic Entities comports with FDA-approved uses are not misleading  
26 as a matter of law or otherwise actionable.

27           **THIRTY-SEVENTH.** Plaintiffs fail to plead any actionable misrepresentation or omission  
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1 made by or attributable to the Actavis Generic Entities.

2 **THIRTY-EIGHTH.** Plaintiffs fail to plead any duty owed to Plaintiffs by The Actavis  
3 Generic Entities.

4 **THIRTY-NINTH.** The Actavis Generic Entities’ rights under the Due Process Clause of  
5 the U.S. Constitution and applicable state Constitution or statute are violated by any financial or  
6 other arrangement that might distort a government attorney’s duty to pursue justice rather than his  
7 or her personal interests, financial or otherwise, in the context of a civil enforcement proceeding,  
8 including by Plaintiffs’ use of a contingency fee contract with private counsel.

9 **FORTIETH.** Plaintiffs have failed to join one or more necessary and indispensable parties.

10 **FORTY-FIRST.** Plaintiffs’ claims against the Actavis Generic Entities are barred or  
11 limited by the economic loss rule.

12 **FORTY-SECOND.** To the extent each Plaintiffs’ claims are based the alleged conduct of  
13 other Defendants, and Plaintiffs seek to impose liability on the Actavis Generic Entities only by  
14 virtue of the Actavis Generic Entities’ ownership of another Defendant’s shares, membership  
15 within another Defendant’s unincorporated entity, or similar affiliation, Plaintiffs have failed to  
16 plead—and cannot prove—any allegations sufficient to support a claim to pierce the corporate veil  
17 or to otherwise hold the Actavis Generic Entities liable merely by virtue of its corporate affiliation  
18 with any other Defendant.

19 **FORTY-THIRD.** Plaintiffs’ claims against the Actavis Generic Entities are barred under  
20 the municipal cost recovery rule.

21 **FORTY-FOURTH.** To the extent Plaintiffs attempt to seek equitable relief, Plaintiffs are  
22 not entitled to such relief because Plaintiffs have an adequate remedy at law and cannot otherwise  
23 satisfy the elements for equitable relief.

24 **FORTY-FIFTH.** Plaintiffs’ claim for unjust enrichment is barred or limited because the  
25 Actavis Generic Entities did not receive and retain any alleged benefit from Plaintiffs.

26 **FORTY-SIXTH.** Plaintiffs have failed to comply with the requirement that they identify  
27 each patient in whose claim(s) they have a subrogation interest.

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1           **FORTY-SEVENTH.** Plaintiffs seek duplicate or double recovery on the same injury or  
2 damage, contrary to California law.

3           **FORTY-EIGHTH.** Any recovery against the Actavis Generic Entities are barred or  
4 limited under the principles of assumption of the risk and informed consent.

5           **FORTY-NINTH.** Plaintiffs' claims and damages are barred or limited, in whole or in part,  
6 by common law, statutory, and state constitutional constraints on the exercise of police powers by  
7 a county commission.

8           **FIFTIETH.** Plaintiffs' damages, if any, were not proximately caused by any act or  
9 omission attributable to the Actavis Generic Entities

10           **FIFTY-FIRST.** As a matter of law, Plaintiffs are not entitled to a declaratory judgment,  
11 injunction, or attorney's fees for these alleged claims.

12           **FIFTY-SECOND.** Plaintiffs' claim of public nuisance is barred or limited because, among  
13 other reasons, no action of the Actavis Generic Entities involved interference with real property,  
14 illegal conduct perpetrated by third-parties involving the use of an otherwise legal product does not  
15 involve a public right against the manufacturer sufficient to state a claim for public nuisance, the  
16 alleged public nuisance would have impermissible extraterritorial reach, and the alleged wrongful  
17 conduct of the Actavis Generic Entities are too remote from the alleged injury as a matter of law  
18 and due process.

19           **FIFTY-THIRD.** To the extent Plaintiffs seek punitive, exemplary, or aggravated damages,  
20 any such damages are barred because the products at issue, and their labeling, were subject to and  
21 received pre-market approval by the FDA under 52 Stat. 1040, 21 U.S.C. § 301.

22           **FIFTY-FOURTH.** To the extent Plaintiffs seek to impose liability on the Actavis Generic  
23 Entities for broad, general statements regarding the value or quality of the Actavis Generic Entities'  
24 products that were made to and reasonably understood by providers as opinion, such statements  
25 cannot constitute false representations as a matter of law.

26           **FIFTY-FIFTH.** To the extent any agents, employees, or contractors of the Actavis Generic  
27 Entities caused any of the damages alleged by Plaintiffs, such agents, employees, or contractors  
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1 were acting outside the scope of the agency employment, or contract with the Actavis Generic  
2 Entities, and any recovery against the Actavis Generic Entities must be reduced by the  
3 proportionate fault of such agents, employees, or contractors.

4 **FIFTY-SIXTH.** The Actavis Generic Entities contend that it (and Teva USA and  
5 Cephalon) have been misjoined pursuant to Rule 20 of the Federal Rules of Civil Procedure, and  
6 they should be dropped in accordance with the Rule 21 of the Federal Rules of Civil Procedure.  
7 Alternatively, the claims against the Actavis Generic Entities (and Teva USA and Cephalon) should  
8 be severed and proceeded with separately in accordance with Rule 21 and the other applicable  
9 Federal Rules of Civil Procedure.

10 **DEFENSES RESERVED**

11 The Actavis Generic Entities hereby give notice that it intends to rely upon any other  
12 defenses that may become available or apparent during the discovery proceedings in this matter,  
13 hereby reserve its right to amend its Answer and to assert any such defenses, and hereby preserve  
14 each and every defense, including but not limited to the defenses set forth in Rules 8, 9 and 12 of  
15 the Federal Rules of Civil Procedure.

16 **DEMAND FOR JURY TRIAL**

17 The Actavis Generic Entities hereby demand a trial by jury of all issues so triable.

18 WHEREFORE, The Actavis Generic Entities demand judgment dismissing Plaintiffs’  
19 Complaint in its entirety, together with costs and disbursements. The Actavis Generic Entities  
20 further demand such other relief, both general and specific, at law or in equity, to which it is justly  
21 entitled.

22 Dated: November 12, 2020

Respectfully submitted,

23  
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**CERTIFICATE OF SERVICE**

I, Wendy West Feinstein, certify that on November 12, 2020, I electronically filed the foregoing with the Clerk of this Court by using the CM/ECF system, which will accomplish service through the Notice of Electronic Filing for parties and attorneys who are Filing Users.

/s/ Wendy West Feinstein  
Wendy West Feinstein