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11 Attorneys for Defendant Anda, Inc.

12 **UNITED STATES DISTRICT COURT**  
13 **NORTHERN DISTRICT OF CALIFORNIA**

14  
15 CITY AND COUNTY OF SAN FRANCISCO,  
16 et al.,

17 Plaintiffs,

18 vs.

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

20 Defendants.

Case No. 3:18-cv-07591-CRB

**ANDA INC.'S RESPONSES AND  
OBJECTIONS TO PLAINTIFF'S FIRST SET  
OF INTERROGATORIES TO ANDA, INC.**

Honorable Charles R. Breyer

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26 **PLAINTIFFS TRIAL**  
**EXHIBIT**  
**P-17502\_00001**

1 Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Defendant Anda, Inc. (herein  
2 “Anda”) hereby responds to Plaintiff’s First Set of Interrogatories to it (the “Interrogatories”) as follows:

3 **PRELIMINARY STATEMENT**

4 1. The objections and responses provided herein are for use in this action and for no other  
5 purpose and are provided subject to that limitation.

6 2. Anda’s responses to the Interrogatories are made without in any way waiving or  
7 intending to waive:

8 a. any objections as to the competency, relevance, materiality, propriety, privilege,  
9 or admissibility as evidence, for any purpose, of any information or documents referred to or  
10 produced in response to the Interrogatories;

11 b. the right to object on any ground to the use of the information or documents  
12 produced in response to the Interrogatories at any hearings or at trial, or in any subsequent  
13 proceedings; or

14 c. the right at any time to revise, correct, add to, supplement, or clarify any of the  
15 responses contained herein.

16 3. Anda’s responses to the Interrogatories shall not be deemed to constitute admissions:

17 a. that any particular information, document or thing exists, is relevant, non-  
18 privileged, or admissible in evidence; or

19 b. that any statement or characterization in the Interrogatories is accurate or  
20 complete.

21 4. Anda reserves the right at any time to revise, supplement, correct, clarify, or add to these  
22 objections and responses. Anda further reserves the right to object on any ground and at any time to a  
23 demand for further responses to the Interrogatories, or for production of additional documents in  
24 response to the Interrogatories.

25 5. Anda’s objections and responses below are provided without prejudice to Anda’s right to  
26 produce evidence of any subsequently discovered facts. Anda therefore reserves its right to provide  
27 further responses as additional facts are ascertained.

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1 **GENERAL OBJECTIONS**

2 1. Anda objects to the Interrogatories insofar as they are vague, ambiguous, duplicative,  
3 overly broad, unduly burdensome or oppressive, or seek information or documents that are not relevant  
4 to any party’s claim or defense, not proportional to the needs of the case, and/or otherwise seek  
5 information beyond the scope provided for by the Federal Rules of Civil Procedure, or any other  
6 applicable laws or rules.

7 2. Anda objects to the Interrogatories as overly broad and unduly burdensome to the extent  
8 that the requested information is available from other sources, including publicly available sources  
9 and/or documents produced by the parties or third parties in *In Re National Prescription Opiate*  
10 *Litigation*, MDL No. 2804, Case No. 17-md-2804 (N.D. Ohio) (the “MDL”) or *The City and County of*  
11 *San Francisco, California and the People of the State of California, et al. v. Purdue Pharma L.P., et al.*,  
12 Case No. 3:18-cv-7591 (N.D. Cal.) (the “Litigation”).

13 3. Anda objects to the Interrogatories as overly broad and unduly burdensome to the extent  
14 they purport to seek documents and information not relevant nor reasonably likely to lead to the  
15 discovery of admissible evidence in the Litigation.

16 4. Anda objects to the Interrogatories as overly broad, unduly burdensome, oppressive, and  
17 not proportional to the needs of the case to the extent they purport to request information beyond the  
18 temporal and geographic scope relevant to this case. Unless otherwise indicated, Anda will provide  
19 information and/or documents in response to the Interrogatories using the geographic scope of the “Bay  
20 Area” counties in California as described in the Court’s ruling in Discovery Order No. 3 (Dkt. No. 419)<sup>1</sup>  
21 (the “Relevant Geographic Regions”) and temporal scope used in the MDL (the “Relevant Time  
22 Period”), and will supplement its responses to be consistent with any ruling by the Court applicable to  
23 Anda on the temporal and geographic scope of discovery.

24 5. Anda objects to the Interrogatories as overly broad, unduly burdensome, oppressive, and  
25 not proportional to the needs of the case with respect to Anda in particular, including without limitation  
26 due to the breadth of the requested information and/or documents.

27 \_\_\_\_\_  
28 <sup>1</sup> Pursuant to Discovery Order No. 3, the “Bay Area” counties are “San Francisco, Alameda, Contra  
Costa, Sonoma, Marin, San Mateo, Santa Clara, Solano and Napa.” (Dkt. No. 419, p. 1.)

1           6.       Anda objects to the Interrogatories to the extent that they seek to impose obligations  
2 broader than, or inconsistent with, Anda's obligations under the Federal Rules of Civil Procedure, the  
3 applicable local rules, other applicable laws or rules, and/or any other applicable court order(s).

4           7.       Anda objects to any implications and to any explicit or implicit characterization of facts,  
5 events, circumstances, or issues in the Interrogatories. Anda's responses to the Interrogatories are not  
6 intended to indicate that Anda adopts, concedes, or agrees with any implication or any explicit or  
7 implicit characterization of facts, events, circumstances, or issues described by Plaintiff in the  
8 Interrogatories, or that such implications or characterizations are accurate and/or relevant to the  
9 Litigation.

10          8.       Anda objects to the extent the Interrogatories incorrectly imply that Anda engaged in any  
11 of the conduct characterized or otherwise referenced in the Interrogatories. The responses to the  
12 Interrogatories are not intended to indicate that Anda adopts, concedes, or agrees with any such  
13 implications or characterizations, or that such implications or characterizations are accurate and/or  
14 relevant to the Litigation.

15          9.       Anda objects to the Interrogatories insofar as they seek communications or other  
16 information protected from discovery by the attorney-client privilege, work product doctrine, or other  
17 privilege or protection, or seek communications or other information otherwise immune or protected  
18 from discovery and/or disclosure. Anda does not intend to waive any applicable privileges or  
19 protections by supplying information in response to the Interrogatories. On the contrary, Anda  
20 specifically intends to preserve any and all applicable privileges or protections.

21          10.       Inadvertent disclosure of any information or production of any document in response to  
22 the Interrogatories shall not constitute a waiver of any privilege or any other ground for objecting to  
23 discovery with respect to such information or document (or any other information or document), or with  
24 respect to the subject matter thereof, nor shall such inadvertent production waive Anda's right to  
25 demand the return of such information or document pursuant to the terms of the relevant Case  
26 Management Order and Protective Order entered in this case.

27          11.       Anda objects to the Interrogatories to the extent they seek any other confidential,  
28 proprietary, or commercially sensitive information and/or trade secrets. Anda will only produce such

1 confidential, proprietary, or commercially sensitive information and/or trade secrets subject to the terms  
2 of the relevant Case Management Order and Protective Order entered in this case.

3 12. Anda objects to the “Definitions” and “Instructions” in the Interrogatories to the extent  
4 they purport to impose discovery obligations on Anda greater than those imposed or authorized by the  
5 Federal Rules of Civil Procedure, the applicable local rules, other applicable laws or rules, and/or any  
6 other applicable court order(s).

7 13. Anda objects to the Interrogatories definition of “You” and “Your” as vague, ambiguous,  
8 overly broad, and unduly burdensome, including without limitation to the extent it purports to include  
9 Anda’s corporate parent, subsidiaries, or affiliates.

10 14. Anda objects to the Interrogatories’ definition of “Document” to the extent it exceeds the  
11 scope of Fed. R. Civ. P. 34(a)(1)(A) or (B).

12 15. Anda objects to the Interrogatories’ definition of “Communications” as overly broad,  
13 unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and not  
14 proportional to the needs of the case, including without limitation because it purports to require the  
15 search and collection of sources such as “messages on ‘social networking’ sites” and “shared  
16 applications from cell phones.”

17 16. Anda objects to the Interrogatories’ definition of “Customer” as overly broad, unduly  
18 burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and not  
19 proportional to the needs of the case, including without limitation because it purports to include entities  
20 outside of the Relevant Geographic Regions. Anda will provide information in response to the  
21 Interrogatories as set forth in the individual Responses below and will supplement its Responses  
22 consistent with any ruling from the Court applicable to Anda on the geographic scope of discovery.

23 17. Anda objects to the Interrogatories’ definitions of “Opioid(s)” as vague, ambiguous, and  
24 overly broad, including, without limitation to the extent it purports to include substances “used to  
25 control pain, including, but not limited to, the drugs referenced in Plaintiff’s First Amended Complaint  
26 in the above-referenced matter.” Anda will produce documents in response to these Interrogatories as  
27 set forth in the individual Responses below and consistent with the MDL Court’s rulings setting forth  
28 the products at issue, i.e., Discovery Ruling No. 2 (Dkt. 693) (“Defendants shall produce discovery

1 related to all opioid products that are or ever were classified as Schedule II under the Controlled  
2 Substances Act”).

3 18. Anda objects to the Interrogatories’ definition of “Order(s) of Interest” as vague,  
4 ambiguous, overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of  
5 admissible evidence, and not proportional to the needs of the case. Anda further objects to the definition  
6 of “Order(s) of Interest” due to its incorporation of the defined terms “Opioid(s).”

7 19. Anda objects to the Interrogatories’ definition of “Suspicious Order” as vague and  
8 ambiguous to the extent it purports to be “defined by DEA.” DEA has not defined the term “suspicious  
9 order.” Anda further objects to the definition of “Suspicious Order” as overly broad, unduly  
10 burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and not  
11 proportional to the needs of the case. Anda further objects to the definition of “Suspicious Order” due to  
12 its incorporation of the defined terms “Opioid(s).”

13 20. Anda objects to the Interrogatories’ instruction that the Interrogatories cover the time  
14 period from “one year prior to the launch of each relevant Opioid through the date of Your response” as  
15 overly broad, unduly burdensome, and not proportional to the needs of the case, including without  
16 limitation because it purports to require Anda to search for and produce documents (to the extent they  
17 even exist and are accessible) that are outside the relevant statute(s) of limitations and are not relevant to  
18 Plaintiff’s claims. Anda will provide information from the Relevant Time Period in response to these  
19 Interrogatories.

20 21. Anda objects to the Interrogatories’ instruction regarding referencing “the Bates stamp  
21 range” of documents “produced in discovery in any MDL proceeding,” as well as to certain of the  
22 Interrogatories’ instruction to identify the Bates stamp range in response, as overly broad, unduly  
23 burdensome, and not proportional to the needs of the case, including without limitation because it  
24 purports to impose obligations on Anda beyond the requirements of the Federal Rules of Civil Procedure  
25 and this Court’s orders.

26 22. Anda objects to the Interrogatories’ instruction regarding the production of electronically  
27 stored information (“ESI”), video, and audio files. Anda will produce documents and ESI in accordance  
28 with the ESI Order applicable in this case. (Dkt. No. 279.)



1 client privilege, work product doctrine, and any other applicable privileges or protections. Anda  
2 specifically objects to the use of the terms “Suspicious Orders” and “Order of Interest” as such terms are  
3 vague, ambiguous, misleading, overly broad and unduly burdensome, and to the extent they call for  
4 legal conclusions. For purposes of responding to this Interrogatory, Anda defines the phrase “suspicious  
5 order” as any order for a Controlled Substance at issue in the Litigation that Anda, after application of  
6 its policies and procedures, concluded was suspicious, including any order Anda concluded was of  
7 “unusual size,” “deviat[ed] substantially from a normal pattern,” or was an “order[] of unusual  
8 frequency.” Anda further objects to this Interrogatory for seeking information regarding specific  
9 “Suspicious Orders,” when Plaintiff has expressly disclaimed the relevance of such information to its  
10 claims, in favor of aggregate proof. *See, e.g.*, Dec. 9, 2020 Tiffany Ellis Letter to Eric Buhr, p. 4 (“The  
11 People reiterate that the People do not attribute any injury that they have suffered to any individual  
12 suspicious orders or individual prescriptions, but to the aggregate of Defendants’ creation of and  
13 contribution to a public nuisance . . . the People will not identify suspicious orders or prescriptions tied  
14 to specific injury”).

15 Subject to Anda’s Preliminary Statement, General Objections, and Specific Objections, pursuant  
16 to Fed. R. Civ. P. 33(d), Anda directs Plaintiff to the documents listed by bates number on Appendix A  
17 attached hereto, which reference orders, including orders placed by customers in California, that Anda  
18 determined to be a “suspicious order” during the Relevant Time Period.

19 With respect to “Orders of Interest” as Anda understands that term, Anda will produce a report  
20 that reflects the activity resulting from operation of its electronic order monitoring system for orders  
21 placed for products at issue by customers in the Relevant Geographic Regions from December 2011 to  
22 December 2018. This report will include orders reviewed by: (i) Anda’s own electronic order  
23 monitoring system from December 2011 through March 2017; and (ii) the electronic order monitoring  
24 system operated by Buzzeo PDMA on behalf of Anda from March 2017 through December 2018.

25 Anda’s policies and procedures for identifying potentially suspicious orders, or orders of interest,  
26 evolved over time in response to changing technology, guidance from DEA, and evolving industry  
27 customs, practices and standards. These policies and procedures at all times relevant to this action  
28 required manual review of potentially suspicious orders by Anda’s compliance team. Specifically, from



1 at least the beginning of the Relevant Time Period, Anda had an electronic system in place that  
2 precluded customers from placing orders for controlled substances above specified amounts. If a  
3 customer desired to place orders exceeding such a limit, Anda's compliance department conducted  
4 further due diligence of the customer and the request to increase permissible order quantity to determine  
5 whether any changes were warranted. If, following review, a customer were granted an increase in its  
6 limits, the customer would then be allowed to place an order within the new permissible limit.  
7 Beginning in December 2011, Anda augmented this system by implementing an electronic order  
8 monitoring system to review each order for a product at issue (among other products) as part of its order  
9 review process. All orders flagged by the electronic order monitoring system were manually reviewed  
10 by the Anda compliance team to make a determination whether such orders were appropriate for  
11 shipment or, in the alternative, whether the order would be deemed suspicious, cancelled and reported to  
12 DEA in accordance with Anda's policies and procedures.

13 In addition, pursuant to Fed. R. Civ. P. 33(d), Anda refers Plaintiff to the customer files related  
14 to its customers in the Relevant Geographic Regions that have been or will be produced for information  
15 relating to any suspicious orders or orders of interest related to those customers.

16 **INTERROGATORY NO. 2:**

17 For each Suspicious Order from any of Your Customers in the State of California You  
18 identified but did not report to the DEA or California Board of Pharmacy during the time period, please  
19 describe in as much detail as possible the reasons you did not report each Order. After each entry, please  
20 Identify the Bates range which corresponds to each Suspicious Order to enable a finder of fact to  
21 correlate each Suspicious Order to each Document produced in response to Plaintiffs' Request for  
22 Production No. 3 dated April 16, 2020.

23 **RESPONSE TO INTERROGATORY NO. 2:**

24 Anda objects to this Interrogatory by adopting and incorporating by reference its Preliminary  
25 Statement and General Objections. Anda further objects to this Interrogatory on the grounds that it is  
26 vague and ambiguous, particularly the term "identified." Anda objects to this Interrogatory as overly  
27 broad, unduly burdensome and oppressive, not proportional to the needs of the case, and for seeking  
28 information not relevant to the subject matter of this case, including, without limitation, insofar as it

1 purports to require Anda to provide information unrelated to the Litigation; insofar as it purports to  
2 impose a geographic scope extending to the entire state of California; insofar as it purports to impose a  
3 temporal scope of nearly twenty-five years; and insofar as it assumes facts. Anda further objects to this  
4 Interrogatory to the extent it seeks information protected by the attorney-client privilege, work product  
5 doctrine, and any other applicable privileges or protections. Anda specifically objects to the use of the  
6 term “Suspicious Order” as vague, ambiguous, misleading, overly broad and unduly burdensome, and  
7 calling for legal conclusions. For purposes of responding to this Interrogatory, Anda defines the phrase  
8 “suspicious order” as any order for a Controlled Substance at issue in the Litigation that Anda, after  
9 application of its policies and procedures, concluded was suspicious, including any order Anda  
10 concluded was of “unusual size,” “deviat[ed] substantially from a normal pattern,” or was an “order[] of  
11 unusual frequency.” Anda further objects to this Interrogatory for seeking information regarding  
12 specific “Suspicious Order[s],” when Plaintiff has expressly disclaimed the relevance of such  
13 information to its claims, in favor of aggregate proof. *See, e.g.*, Dec. 9, 2020 Tiffany Ellis Letter to Eric  
14 Buhr, p. 4 (“The People reiterate that the People do not attribute any injury that they have suffered to  
15 any individual suspicious orders or individual prescriptions, but to the aggregate of Defendants’ creation  
16 of and contribution to a public nuisance . . . the People will not identify suspicious orders or  
17 prescriptions tied to specific injury”).

18 Subject to Anda’s Preliminary Statement, General Objections, and Specific Objections, Anda  
19 states that since at least September 2007, any order that Anda determined to be a “suspicious order” was  
20 reported to DEA, cancelled and not shipped. For orders placed by a customer located within the  
21 Relevant Geographic Regions during the period between January 1, 2006 and September 2007 that Anda  
22 determined to be “suspicious orders,” and that Anda shipped at or around the time it reported such  
23 orders to DEA, please see the following documents included on Appendix A:

- 24 Anda\_Opioids\_MDL\_0000124928; Anda\_Opioids\_MDL\_0000124943;  
25 Anda\_Opioids\_MDL\_0000124945; Anda\_Opioids\_MDL\_0000124963;  
26 Anda\_Opioids\_MDL\_0000125002; Anda\_Opioids\_MDL\_0000271707;  
27 Anda\_Opioids\_MDL\_0000280967.

1 **INTERROGATORY NO. 3:**

2 For each Suspicious Order from any of Your Customers in the State of California You reported  
3 to the DEA or California Board of Pharmacy during the time period, please Identify whether You  
4 declined the Order or shipped the Order.

5 **RESPONSE TO INTERROGATORY NO. 3:**

6 Anda objects to this Interrogatory by adopting and incorporating by reference its Preliminary  
7 Statement and General Objections. Anda further objects to this Interrogatory on the grounds that it is  
8 vague and ambiguous, particularly the terms “declined,” and “shipped.” Anda objects to this  
9 Interrogatory as overly broad, unduly burdensome and oppressive, not proportional to the needs of the  
10 case, and for seeking information not relevant to the subject matter of this case, including, without  
11 limitation, insofar as it purports to require Anda to provide information unrelated to the Litigation;  
12 insofar as it purports to impose a geographic scope extending to the entire state of California; insofar as  
13 it purports to impose a temporal scope of nearly twenty-five years; and insofar as it assumes facts. Anda  
14 specifically objects to the use of the term “Suspicious Order” as vague, ambiguous, misleading, overly  
15 broad and unduly burdensome, and calling for legal conclusions. For purposes of responding to this  
16 Interrogatory, Anda defines the phrase “suspicious order” as any order for a Controlled Substance at  
17 issue in the Litigation that Anda, after application of its policies and procedures, concluded was  
18 suspicious, including any order Anda concluded was of “unusual size,” “deviat[ed] substantially from a  
19 normal pattern,” or was an “order[] of unusual frequency.” Anda further objects to this Interrogatory for  
20 seeking information regarding specific “Suspicious Order[s],” when Plaintiff has expressly disclaimed  
21 the relevance of such information to its claims, in favor of aggregate proof. *See, e.g.*, Dec. 9, 2020  
22 Tiffany Ellis Letter to Eric Buhr, p. 4 (“The People reiterate that the People do not attribute any injury  
23 that they have suffered to any individual suspicious orders or individual prescriptions, but to the  
24 aggregate of Defendants’ creation of and contribution to a public nuisance . . . the People will not  
25 identify suspicious orders or prescriptions tied to specific injury”).

26 Subject to Anda’s Preliminary Statement, General Objections, and Specific Objections, Anda  
27 incorporates by reference its response to Interrogatory No. 2.

1 **INTERROGATORY NO. 4:**

2 Describe Your understanding or knowledge of each of Your National Retail Pharmacy  
3 Customers' Suspicious Order Monitoring Systems, including: how each Suspicious Order Monitoring  
4 System changed each year; the individual or individuals from each of Your National Retail Pharmacy  
5 Customers who provided you with that information; and the identify of each of Your Employees in  
6 charge of evaluating each of Your National Retail Pharmacy Customers' Suspicious Order Monitoring  
7 Systems by year during the time period.

8 **RESPONSE TO INTERROGATORY NO. 4:**

9 Anda objects to this Interrogatory by adopting and incorporating by reference its Preliminary  
10 Statement and General Objections. Anda further objects to this Interrogatory to the extent it seeks  
11 information protected by the attorney-client privilege, work product doctrine, and any other applicable  
12 privileges or protections. Anda further objects to this Interrogatory on the grounds that it is vague and  
13 ambiguous, particularly the terms "understanding," "knowledge," "National Retail Pharmacy  
14 Customers," and "evaluating." Anda objects to this Interrogatory as overly broad, unduly burdensome  
15 and oppressive, and for seeking information not relevant to the subject matter of this case, including,  
16 without limitation, insofar as it purports to require Anda to provide information unrelated to this case;  
17 insofar as it seeks materials that are available from other sources, including documents produced by the  
18 parties or third parties in this case; insofar as it purports to impose a geographic scope extending to any  
19 of Anda's customers located anywhere without regard to their connection to the Litigation; insofar as it  
20 purports to impose a temporal scope of nearly twenty-five years; and insofar that it assumes facts that  
21 have not been established.

22 Subject to Anda's Preliminary Statement, General Objections, and Specific Objections, Anda  
23 states that it is willing to meet and confer regarding this request.

24 **INTERROGATORY NO. 5:**

25 For each Opioid (branded or generic) that You sold or distributed in the State of California,  
26 provide a quarterly and annual sales summary, including for each Opioid: (1) the product name; (2) the  
27 base code for the product; (3) gross dollar sales for that Opioid; (4) the gross profit for that Opioid; (5)  
28 sales volume by number of pills or other dosage units for that Opioid; (6) sales volume by number of

1 SKU units/bottles for that Opioid; (7) market share for that Opioid; and (8) the documents relied upon to  
2 generate the summary.

3 **RESPONSE TO INTERROGATORY NO. 5:**

4       Anda objects to this Interrogatory by adopting and incorporating by reference its Preliminary  
5 Statement and General Objections. Anda further objects to this Interrogatory on the grounds that it is  
6 vague and ambiguous, particularly the terms “sales,” and “market share.” Anda further objects to this  
7 Interrogatory as overly broad, unduly burdensome and oppressive, and for seeking materials not relevant  
8 to the subject matter of this case, including, without limitation, insofar as it purports to require Anda to  
9 provide documents or information unrelated to this case; insofar as it purports to impose an unlimited  
10 geographic scope; and insofar as it purports to impose a temporal scope of nearly twenty-five years.  
11 Anda further objects to this Interrogatory to the extent that it seeks materials that are available from  
12 other sources, including documents produced by the parties or third parties in this case. Anda further  
13 objects to this Interrogatory to the extent it seeks information that Anda does not typically maintain in  
14 the normal course of its business for a specific geographic area, including gross profits by product and  
15 market share by product, and therefore will not be producing information in response to subparagraphs  
16 (4) and (7) of this Interrogatory.

17       Subject to Anda’s Preliminary Statement, General Objections, and Specific Objections, Anda  
18 states that Plaintiff can derive the information requested by subparagraphs (1), (2), (5) and (6) from the  
19 transactional data Anda produced or will produce in this matter, and that the burden of deriving that  
20 information from the data provided is the same on Plaintiff as it is on Anda. Specifically, pursuant to  
21 Fed. R. Civ. P. 33(d), Anda refers to Plaintiff to the transactional data it produced on October 1, 2020,  
22 bates labeled Anda\_Opioid\_CA\_SF-Tx-Data-SF\_0000001, as well as to its forthcoming supplemental  
23 production of transactional data for additional customers in the State of California, which will provide  
24 the same data fields, and which contains information responsive to this request.

25 **INTERROGATORY NO. 6:**

26       Please Identify any Customers in the State of California with whom you Communicated  
27 regarding Your Compliance Assistance Program or Compliance Analysis Program, for each Customer  
28 that you Identify, please provide the dates of the Communication, the names of the employees involved

1 in the Communication, the purpose of the Communication, and whether each Customer participated in  
2 Your Compliance Assistance Program or Compliance Analysis Program.

3 **RESPONSE TO INTERROGATORY NO. 6:**

4       Anda objects to this Interrogatory by adopting and incorporating by reference its Preliminary  
5 Statement and General Objections. Anda further objects to this Interrogatory to the extent it seeks  
6 information protected by the attorney-client privilege, work product doctrine, and any other applicable  
7 privileges or protections. Anda objects to this Interrogatory on the grounds that it is vague and  
8 ambiguous, particularly the term “Customers in the State of California.” Anda further objects to this  
9 Interrogatory as overly broad, unduly burdensome and oppressive, including, without limitation, insofar  
10 as it purports to impose a geographic scope extending to the entire state of California; insofar as it  
11 purports to impose a temporal scope of nearly twenty-five years; and insofar as it assumes facts.

12       Subject to Anda’s Preliminary Statement, General Objections, and Specific Objections, Anda  
13 states that, based on its investigation to date, it is not aware of any information responsive to this  
14 Interrogatory.

15  
16  
17 DATED: January 19, 2021


**FOLEY & LARDNER LLP**  
Alan R. Ouellette

*/s/ Katy E. Koski*  
\_\_\_\_\_  
Alan R. Ouellette  
James W. Matthews (appearance *Pro Hac Vice*)  
Ana M. Francisco (appearance *Pro Hac Vice*)  
Katy E. Koski (appearance *Pro Hac Vice*)

Attorneys for Defendant  
ANDA, INC.

1 VERIFICATION

2 I, Jay Spellman, hereby state that I am the Executive Director of Regulatory Compliance and  
3 Distribution for Defendant Anda, Inc. and verify that the statements made in the foregoing Responses  
4 and Objections to Plaintiff's First Set of Interrogatories to Anda, Inc. are true and correct to the best of  
5 my knowledge, information and belief.  
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8   
9 Jay Spellman  
10 Executive Director of Regulatory Compliance and Distribution  
11 Anda, Inc.

11 Date: 1/14/2021  
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