A Watson Pharma, Inc.

Call Center Operations
Licenses Administrator Operational Procedure

PROCEDURE:	**SAP License Maintenance Create, Change License or Create, Change Listing/Exclusion for Controlled and Non-Controlled substance License**		
Call Center Policy Number:	**OPDLA 507200-01.03**	**Policy Effective Date**	May 3, 2004
Revision Number:	**.04**	**Revision date:**	November 17, 2005
Revision Written by:	**Karen Schomer**		
CTM Transaction:	**VX01N- License Create VX02N- License Change VB01- Create Listing / Exclusion VB02- Change Listing / Exclusion VE30- Existing Licenses VE31- License Blocked Sales Orders VCH1- Create Batch Search Strategy VCH2- Change Batch Search Strategy**	**CTM Doc #**	
Prerequisites SAP Transaction Code	**VD01- Create Customer VD02- Change Customer**		
Post requisites SAP Transaction Code			

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Purpose

Establish and maintain the proper method of applying licensing information on an account to ensure compliance with the Drug Enforcement Administration (DEA) licensing requirements and the Prescription Drug Marketing Act (PDMA), as well as, the National Association of Boards of Pharmacy.

Scope

All SAP Customer Master Account records.

Procedure

Once a customer account has been opened, reactivated or updated, the Customer Master Administrator will submit the new account maintenance form, along with the SAP account number to the Licensing Administrator. The licensing information should be reviewed and verified for accuracy. Licensing varies depending on the type of account:

- Wholesaler
- Pharmacy (Chain or Independent); Hospitals and Clinics
- Licensed Medical Practitioners

All information necessary for analysis, review and validation of a license must be submitted to the SAP Licensing Administrator.

The following information is verified against the current License for accuracy:

1. Customer Name
2. Class of Trade (this may differ from the selections in SAP. If needed the License Administrator should contact the Customer Master Administrator for clarification)
3. Ship-To Address

   Note: Ship-to address MUST match the License, however PDMA regulations policy to ship non-controlled sample products only to a facility that the requesting practitioner operates from. If the address of the licensed practitioner does not match the address of the practitioner's license. The License Administrator must obtain a copy of a voided Rx from the physician as proof that this is a facility the practitioner is operating from.
4. DEA number / State License
5. DEA expiration date / State License expiration date
6. Approved Drug Schedule(s)

A. DRUG SUBSTANCES – Controlled:

1. DEA License

DEA license is REQUIRED for orders containing controlled substances. The DEA license includes the DEA license number, DEA license expiration date and the approved drug schedules (2, 2N, 3, 3N, 4, 5).

Schedule	Regulatory Definitions
2	High Potential for abuse. Use may lead to severe physical or psychological dependence. No renewals are permitted
2N	*Same as above except, Non-narcotic*
3	Some potential for abuse. Use may lead to low to moderate physical dependence or high psychological dependence. Up to 5 renewals are allowed within 6 months.
3N	*Same as above except, Non-narcotic*
4	Low potential for abuse. Use may lead to limited dependence either physically or psychologically. Up to 5 renewals are permitted within 6 months.
5	Subject to state and local regulation. Abuse potential is low; a prescription may not be required.
Rx	Prescription *(SAP requirement)*

Verification of the DEA license number, DEA shipping address, and DEA expiration date and drug schedule can be made by:

a. Using The U.S. Department of Commerce National Technical Information Services (NTIS) Drug Enforcement Administration (DEA) website: http://deanumber.com/ (See Exhibit B).

b. Obtaining a photocopy of the DEA license certificate, from the customer.

If information does not exist according to the DEA website or the DEA license has expired, the SAP Licensing Administrator will block the order, in SAP, until the appropriate documentation is received. The SAP Licensing Administrator will contact the customer requesting a photocopy of the DEA License. The License Administrator will update the account upon receipt of a valid DEA license to remove the block on the order, in SAP. The SAP Licensing Administrator must also communicate and report back to the Customer Support department on the licensing status.

If the photocopy of the DEA License is not received, the Customer Master Licensing Administrator will contact the customer a second time requesting the photocopy of the DEA license. If the photocopy of the DEA license is not received a letter (SEE EXHIBIT C) will be mailed to the customer notifying the customer that the pending order will be cancelled until a valid DEA license is received. The License Administrator will update the account with an overall block until a valid license has been received. Once a valid license has been received the overall block will be removed.

c. **The License Administrator will use VE30 report to monitor any possible licenses due to expire and will be creating an excel spreadsheet to maintain and update all letters. It**

will be the Licensing and Customer Master Dept. responsibility to maintain upkeep of these letters and work together. The License Administrator will keep a 12 month filing system on hand for each letter sent to customers which will be filed in the Licensing Dept. The letters need to be filed in the same alphabetical order by customer name, city and account number as the SOMS are currently maintained. If and when an audit is done, any files that stored in Iron Mountain for the prior year need to be requested within a 48 hour timeframe for audit purposes.

*NOTE: On a monthly basis, the DEA registration file information is loaded, by the Information Systems group. The updated information is in accordance with information on file at the DEA. This is inclusive of DEA license expiration date and authorized schedules. However, may not be as current at the DEA website, mentioned above.

A Wholesaler, Distributor, Exporter and Importer may file a "straight" II. This provision allows a registrant to register for only a class 2 schedule, but entitles the registrant to receive both 2 and 2N schedules. All other schedules (3, 3N, 4, 5) must be registered to receive shipment.

Retail Outlets and Practitioners must register all schedules to receive shipment.

The check digit algorithm will determine the validity of a DEA number. The seventh digit of the DEA number is the Check digit. Add the first, third and fifth digits to equal SUM1. Add the second, fourth and sixth digits and then multiply by 2 for Sum2. The least significant digit in these sums is the check digit.

DEA check digit algorithm									
For example: DEA License RW0184159									
DEA	**First**	**Second**	**Third**	**Fourth**	**Fifth**	**Sixth**	**Seventh (check digit)**	**Results**	
RW	**0**		**8**		**1**		**9**	**9**	**Sum1**
		1		**4**		**5**		**10 x 2 = 20**	**Sum2**

2. Creating Exclusion Record

The only time a customer material exclusion is set up is when the customer requests to exclude schedules. The customer may request to exclude schedules because the facility does not have proper storage and/or when the customer's address change doesn't match with the DEA license. When creating exclusions, if there is a need to delete schedule numbers, the entire line must be selected and the delete icon must be used.

3. Violations

The License Administrator will review, receive approval and release sales orders pending licensing verification. This is critical in order to remain in compliance with the DEA, State and PDMA law as it pertains to the sales and distribution or pharmaceutical products. The License Administrator is responsible to ensure that the NTIS DEA file is loaded into SAP. The NTIS CD will be distributed to the Information Systems staff upon receipt (approximately the 3rd week of each month). In a collaborated effort the licensing group will work with the Information Systems department to ensure that the NTIS DEA is loaded on a monthly basis. The Information Systems staff should load the NTIS CD no later than then 1st Friday of each month. This will automatically update current licensing expiration and control substance data. The administrator will work to fulfill request for Control Substance History reports via the Control Substance Compliance department. The administrator will also reconcile all invalid licenses including duplicate, expired, expiring, retired and revoked licenses. Until the license is considered valid, the License Administrator will place a license block on the customer master record. The License Administrator will need to determine why the license is invalid and reconcile the license before the license block can be removed from the customer master record. The License Administrator should use the NTIS website to identify a valid license on the account; request a hard copy of the license or request a letter of extension for the license.

The License Administrator will be responsible for written and verbal communication to customers regarding invalid licenses. They will also be responsible for monthly extract reports, file audits, record retention and other related responsibilities.

4. Licensing Issues

If a current and up-to-date license is not available electronically and if the license certificate has not been sent in by the customer, it will be the License Administrator's responsibility to review the NTIS website and obtain the correct address, prior to the Customer Master group updating the account file. In the event the customer submits a current license then the Customer Master group will automatically update the account record.

When a license, which already exists in SAP, expires there is a shortcut to re-create a new license using the License record, in SAP. Using the License; Copy feature from the SAP Menu Bar will expedite re-creating the license. All the pertinent information from the existing SAP License number will copy to the newly created SAP License number, except information from the Status tab. (Reference the NNN_Expire and Create DEA CTM for detailed instruction on using this shortcut).

Whenever there is a discrepancy between the information in the licensing website and the customer, for example the customer has recently moved to another address, but the website still reflects the old address. The Licensing group should EXPIRE the license, as well as, place an EXCLUSION record against all the schedules on the account. Then the Customer Master group can update the address in SAP. The license will remain expired until the customer decides to place an order requiring a license. At that time, the licensing group will validate the license according to standard procedures.

5. Health Identification Number (HIN)

If the HIN is being used, the Contracts Department need only submit the HIN. No additional documentation is required. The License Administrator will populate the current date in the "valid from" field and 12/31/9999 in the "valid to" field. On the ExpContrClass tab there is no need to include schedules numbers when creating a HIN, this field will be left blank. On the Customers tab, the License Administrator will need to add the customer account number and then accept the license under the Status tab. Write down the SAP internal license number on the spreadsheet provided by the Customer Master Group. Once all the HIN numbers have been created the spreadsheet needs to be forwarded to the Customer Master Group.

6. License blocks

The License Administrator will be responsible to ensure that pending sales orders on hold due to license violations are investigated. Once the investigation has been completed the License Administrator will take the appropriate action necessary to either release the sales order hold or notify the appropriate Order Entry representative regarding the necessary action required in order to update the license. For example, if the order went to License Block (VE31) and we noticed that the customer cannot receive 2 and 2N on their license, we would notify Order Entry to cancel the order. This happens when it is an EDI order or sample order.

7. CII Schedule Drugs and SOMS blocks

The License Administrator will be responsible to ensure that pending sales orders on hold due to suspicious order (SOMS) violation are investigated. **The License Administrator will speak with the CSR responsible for the account to acquire a specific contact name and telephone number to contact the customer. In a given month, necessary steps need to be taken to call the customer if quantity exceeds average usage. The License Administrator will attach note onto the SOM's investigation form, which includes reason of increase on all SKU's of product. For example, if the same SKU suspends again in the same month, the License Administrator will attach a copy of the original resolution to the SOM's investigation form. This process will probably need to be repeated at the start of each month.** Once the investigation has been completed the License Administrator or Manager, will determine to release order or contact the customer to advise the customer that we would need to notify the DEA due to the quantity on their request. The customer will determine whether to reduce the quantity, cancel the order or provide supporting documentation validating the increase in order quantities. Customers understand the issues and avoid bringing attention to these large orders. The License Administrator will release pending sales orders, due to SOMS violations by canceling the order or reducing the quantity of the order, per the customer requirements. Otherwise, the License Administrator will escalate the suspicious order (SOMS) to the next level. If the suspicious order (SOMS) gets to a point of needing to contact the DEA, the License Administrator will contact the Watson Director, Controlled Substance Compliance. The Watson Director, Controlled Substance Compliance will contact the DEA.

When the sales order blocks has been resolved. The License Administrator is responsible to communicate to the Customer Support representative notifying them that the blocks have been removed and are cleared and the order has been released.

Once this SOMS report is confirmed and verified by the Customer, the SOMS report is signed and marked with a reason code by the License Administrator if further approval process is necessary, a copy of the approval form will be forwarded to management to signoff/approve. A copy of the Suspicious Controlled Drug (SOMS) report is attached to the order then filed with the License Administrator. Class 2 and 2N's are filed in a separate filing cabinet. The DEA requires all Class 2 and 2N's filed separately from the 3, 3N, 4 and 5. All SOMS are filed by the account name, account number, City and State, by most current date. If within the same day there are multiple SOMS, then the most current Sales Doc. # is file on top. Process steps are al follows:

SOMS – Suspicious Order Monitoring System (Of Control Drugs Substances)

- **The License Administrator will execute VA05 to determine the value and priority of the orders blocked due to SOMS violations.**

- Sales Orders require a Suspicious Controlled Drug (SOMS) validation. If the sales order or scheduled line item blocks (excessive quantity, more frequent or larger than the normal order pattern), the Order Processing Representative **or License Administrator** will print the SOMS Form. The SOMS form contains the customer's averages on the first page. The SOMS form is submitted to the License Administrator.

- The License Administrator will review the SOMS form, verify customer contact information with the CSR and contact the customer to confirm the quantity ordered and verify the reason for a large or more frequent order.

- Once this SOMS form is confirmed and verified by the customer, the License Administrator will release delivery block, scheduled line item block, revise line item quantity and/or line item reduction.

SOMS approval process:

- The SOMS form is signed, marked with a release reason code by the License Administrator. The License Administrator will also code the SOMS form for any line item deduction and/or line deletion.
-

SOMS approval process for 25% over current order average:

- **The License Administrator will submit the SOMS/Additional Data B form with resolution to Supervisor or Management for review and signature if the order is at or over 25% of the total quantity.**

- **Any order in excess of 25% or more of the average order (units) amount will require a signature sign-off from department supervisor and/or manager.**

- **The following calculation formula helps to identify if the order is at or over 25% of the total quantity:**

  ADD the following columns "MTD Qty and Release Qty" to give you a total order quantity. Take this number and SUBTRACT by the "Customer Avg./mth" column

and then DIVIDE by the "Customer Avg./mth" column which equals the percentage increase.

- The Suspicious Controlled Drug (SOMS) Form/Additional Data B forms are filed and retained by the License Administrator.

B. DRUG SUBSTANCES – Controlled and/or Non-Controlled (applies to both):

1. Signed Practitioner Sample Request Form

The Watson Field Sales Team when detailing a Practitioner may accept a signed Practitioner Sample Request form for certain controlled products for fulfillment by the Watson Sample Order Processing department. The physicians DEA must have the appropriate schedule for the product he is requesting and signing for.

Reference department detailed procedures, Operational Procedure Number: nnnnnnnn

C. DRUG SUBSTANCES – Non-Controlled:

Minimum requirement for non-controlled substance prescription (Rx) drug order, including sample orders.

1. Pharmacies

National Association of Boards of Pharmacy

- State License number
- State License expiration date

Verification of the State License and expiration date can be made by:

1. The National Association of Boards of Pharmacy website (http://nabp net).
2. Obtaining a photocopy of the State License certificate, from the customer.
3. The DEA matching the state expiration date with that of the DEA license expiration date.

2. Licensed Medical Practitioners

State Medical Board

- State License number
- State License expiration date

State verification on the receiving or requesting samples, some states do not allow Mid Level Practioners (NP's Nurse Practioners, PA Physician Practioners or Mid Wife) to request controlled or non-controlled substances. If the Sample Order Processing Clerk places an order for material where the combination of the State and Mid Level Practioner regulations does not permit requested material, a message will appear on the SAP status Bar 'Material nnnnnnnnnn has been

excluded'. The order will not be saved and the Sample Order Processing Clerk will need to manually generate a rejection letter notifying the requestor that the order could not be fulfilled. Also, there are four states Kansas, Kentucky, New York and Rhode Island which DO NOT allow CONTROLLED samples sent to ANY practioners.

Watson subscribes to various vendor databases such as IMS Health Inc. Verification of the State License and expiration date can be made by:

1. Using the Administrators in Medicine (AIM) National Organization for State Medical & Osteopathic Board Executive Directors website (http://www.docboard.org/docfinder.html).
2. Contact the individual state Medical Board, via telephone, and verbally verify the state license. Some states have automated systems where others you will be talking with a live person.

NOTE: Not all states are available on the internet. However, the website contains telephone numbers for each State Board of Pharmacy or Medical State Board. Some states/customer types are licensed by agencies other than a State Board. One example is a Department of Health. Please contact the SAP Licensing administrator with any issues. All conversations/correspondence to a government official must be documented in a Regulatory Diary.

If no information exists or the State license has expired according to SAP, the Licensing Administrator contacts the customer for a photocopy of the State License and updates the account upon receipt.

D. DEA License Renewal Maintenance:

At the beginning of each month, letters (See EXHIBIT C) are sent to our customers by the Licensing Group. These letters will notify the customers that their DEA certificates will be expiring at the end of the month reminding them to either fax or mail a copy of the renewal certificate to us for our files. The License Administrator should execute the following transactions in SAP to determine which DEA license will be invalid once the DEA registration expires.

Need discussion regarding how we will be doing this…

1. *Execute VE30 Display Existing Licenses*
2. *Enter D (DEA) in the Legal regulations fields*
3. *Select C Application accepted, license active, in the License status field of the Validity of License area of the Master data tab.*
4. *Enter the License data range for example 06/01/04 through 06/30/04.*
5. *Execute the transaction.*
6. *Using List; Export; Local File; Rich text format; download the list??? …*

This list includes the DEA number but does not include the Customer Name; Address information. Would need to link the DEA number to the DEA File for Customer Name; Address.

E. License for One Time Customer:

The SAP legal control validation process will block a sales order if a customer's license does not exist or has expired. If the customer's order consists of Rx or control material, a license record must be linked to the sales order for validation. The licensing group will create the appropriate license for a one-time customer and link the license to the one-time ship-to customer's sales order. The Customer Master group will create a one-time customer master template (shell) only once, as necessary. This shell will be used to create orders for one-time customers. A one-time customer shell will be used by order processing to create orders for situations where a permanent customer master record is not needed, such as Tradeshows or Replacement Orders. **A One-time customer shell SHOULD NEVER be used for any site order.** These templates do not include entry of financial (company-level) data; as such, its usage should be restricted to free of charge orders (i.e., samples, literature etc.). If the one-time customer shell is used to generate a sales order, this record will supply basic customer master information and requires the order processing user to input key fields (i.e., name, address etc).

F. Unlicensed Locations:

If a representative receives an order for prescription drugs for an unlicensed location, he/she must fax a Letter of Authorization (see Exhibit A) to a responsible licensed individual who will accept responsibility for non-controlled substance prescription (RX) drugs being shipped to that specific location.
Such customers may include:

- Dialysis Centers
- Universities
- Health Organizations
- Clinics
- Humanitarian Aid
- Family Planning/Planned Parenthood

Doctor/Medical Director license address scenarios are as follows:

1.	same as facility	DEA license (preferable) State license	*Enter DEA # & expiration date *Update State License Field only
2.	different than facility	Letter of Authorization	*Update State License field only *Do not enter DEA # & expiration date

Note: A Letter of Authorization is valid for one year only. The State field can be updated with a one year expiration date or the expiration date of the Doctor/Medical Director License, whichever is earlier.

G. Export License DEA:

DEA used is Theratech Export License DEA. Must be billed under the export license.

Once inventory for the order is in the proper location, Order Entry enters the order (Enter order under Pharma). In note section of order enter Theratech invoice number and date.

Invoices should not be sent to the customer. Invoices must be forwarded to the finance department in Corona, CA.

Reference department detailed procedures, Operational Procedure Number: nnnnnnnn

H. Methamphetamine Control Act:

The License Administrator will create a virtual "MethAct" license in the format of MA and the business entity phone number (i.e. MA6029992002). The License Administrator will update the sales order Header->Text->Notes to be updated with MethAct license number which will reflect approval. Material Classification Rx prescription should be entered on the ExpContrClass tab. The License Administrator will "redetermine" the sales order (unblock) to the newly created MethAct license and the sales order will be released for deliver.

On a daily basis, the License Administrator will check sales order document flow (VA03 Display Sales Order) to confirm a delivery document has been generated. The License Administrator will "Expire" the newly created MethAct license(s) the day after the license has been created. This will ensure a validation process is in place for future orders.

I. Indigent Accounts:

The Physician must provide a copy of the DEA license for physician address or NTIS Registrant Profile is obtained. Separate Customer Master records will be created in SAP. The License Administrator will create the license record and link both the Dialysis Clinic account number and the Physician account number to the DEA number.

J. Papsure Physician Address Changes:

Even though Papsure is an OTC product and does not require a DEA license, if a physician DEA license is available that license should be entered into the SAP system. When a physician has a Papsure order pending and has recently moved to another address but the DEA license (found on the NTIS website) still reflects the old address. When this situation occurs the Customer Master Group will change the address in SAP and then notify the License Group to expire the license and create exclusions on the schedule numbers that are listed on the license. The license will remain expired until the physician sends a new DEA license which reflects the new address change. When the new license is received and/or updated in the NTIS website, the License Group will validate the license according to the standard procedures and delete the schedules that are listed in the exclusion record.

This also applies to any customer that has an address change and the DEA license does not match the address change that the customer submitted.

NOTE: You do not need a license for Papsure orders, since the Material master record considers Papsure as an OTC product, therefore, the order should not be held up for a license.

K. R&D Research and Development:

Shipments for prescription items to facilities for research and/or development purposes do not require licensing. However, the following steps must be taken:

1. The order must be shipped in a sealed box.
2. The order must be clearly marked as "product for research and development."
3. The shipments must be received by a contact person, the name and phone number to be marked on the order.
4. The customer must be instructed to contact ***<License Administrator name>***.when the product will be returned to the distribution center for destruction. Upon receipt of the product in our distribution center, the file will be closed.

L. License Trending Reports:

1. Each Licensing administrator will track daily tasks performed by the Licensing group. These statistics will be captured on an MSExcel spreadsheet Tracking Licensing dept.xls. This spreadsheet can be found in the following network path:
<Drive>:\Sales\Call Center Operations\Licensing Department-Trending Report\

2. The daily tasks tracked included in the monthly trending reports are:

   - Creating, Updating or Expiring Licenses (<drive>:\Sales\Call Center Operations\Customer_Master_Licensing Group\5. Pending_License. folder)
   - SOMS – Suspicious Order Monitoring System – VE31 (Control Drugs Substances)
   - OMS - Order Monitoring System – VE31

3. The License trending report is created monthly in an MSExcel spreadsheet. The monthly report is saves in the following network path:
<Drive>:\Sales\Call Center Operations\Licensing Department-Trending Report\Tracking Licensing dept.xls.

4. Using the report:

   a. Access the Tracking Licensing dept.xls spreadsheet by following the path listed in step 1.
   b. Open the MSExcel file
   c. Select the worksheet for the appropriate month.
   d. Make the necessary entries under the column of that day that matches the task row. Entries are ONLY made in the rows which have the headings printed in blue.
   e. Save the spreadsheet and close.

5. Metrics – Executive Summary

   The Tracking Licensing dept.xls includes a section (Column AI) Metrics – Executive summary. This section provides management with analytics regarding workload. A legend defining each of the tasks tracked is also included.

6. Setup a New Months Worksheet

   a. Unprotect the file using the password "Marco polo"
   b. Copy the existing file onto a new worksheet and label the worksheet appropriately for the new month.
   c. Enter the new dates of each week at the header level.
   d. Remove the data entries in the cells from the prior month's statistics (only those figures that appear where the row heading appears in blue).

e. Update the last cell in the purple column, with a column row heading called "Working days". Insert the number of working days for that week. For example, if the 1st day of the month begins on Friday, then insert a number one in the cell.
f. Save the spreadsheet
g. Protect the spreadsheet using the same password "Marco Polo"
h. Close the spreadsheet.

M. Warning and Error Messages:

Various status indicators will display on the Status Bar while you are working with SAP transactions including warning and error messages.

Warning messages will not prevent the end user from continuing working in the SAP application. If a yellow circle with a black exclamation point is displayed in the status bar click the execute icon (green ball with check mark) to proceed with the transaction. Read the Warning message information and act on it, if necessary, before proceeding.

Hard error messages will restrict the end user from proceeding. If a red circle with an "X" is displayed on the status bar you will not be able to continue working in the system. An error message indicates an incorrect combination of data or invalid data entry. When an error message is displayed the all open screens will be locked, other than the ones in question. Once the data has been corrected and the screen is refreshed the error message will disappear and all of the fields will be unlocked for normal data entry.

Exhibit A – Unlicensed Location (reference OPD # <nnnnn>)

Date:_____

Account:_____

To: Watson Pharmaceutical, Inc.

Attn: Customer Support Services

Phone: (973) 593-5671

Fax: (973) 593-5640

I hereby authorize Watson Pharmaceutical, Inc. to ship orders of pharmaceuticals directly

to _____

located at _____

Utilizing my **DEA Registration or license number** _____

I am affiliated with the clinic and direct the use of pharmaceutical products in it.

By: _____

Print Name: _____

Title: _____

DEA License Address: _____

City/State: _____

Date: _____

* NOTE: If the doctor is no longer affiliated with the facility or does not authorize shipment of prescription drugs, he/she is required to notify Customer Support Services at Watson Pharmaceutical, Inc. at (973) 355-8300 **IMMEDIATELY**.

Exhibit B - NTIS National Technical Information Services

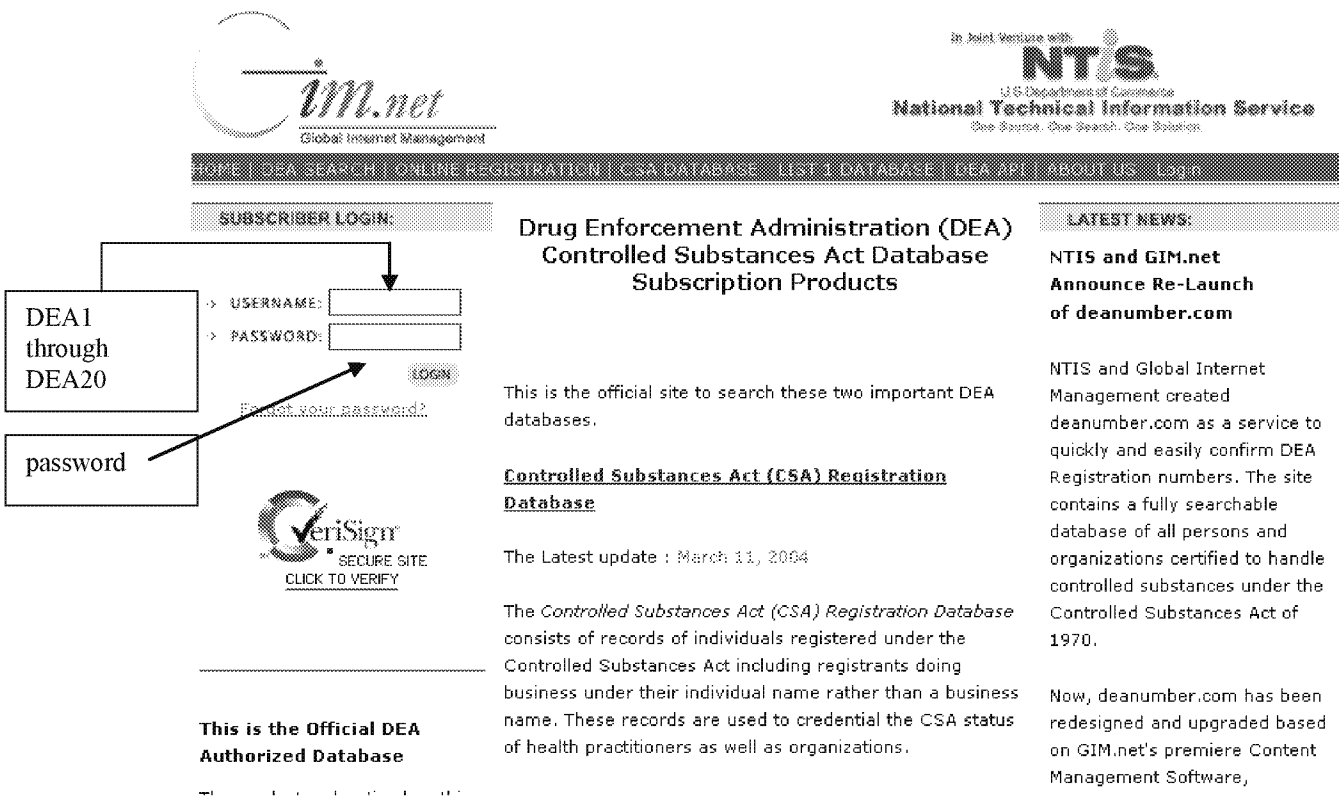

Exhibit B – NTIS continued…

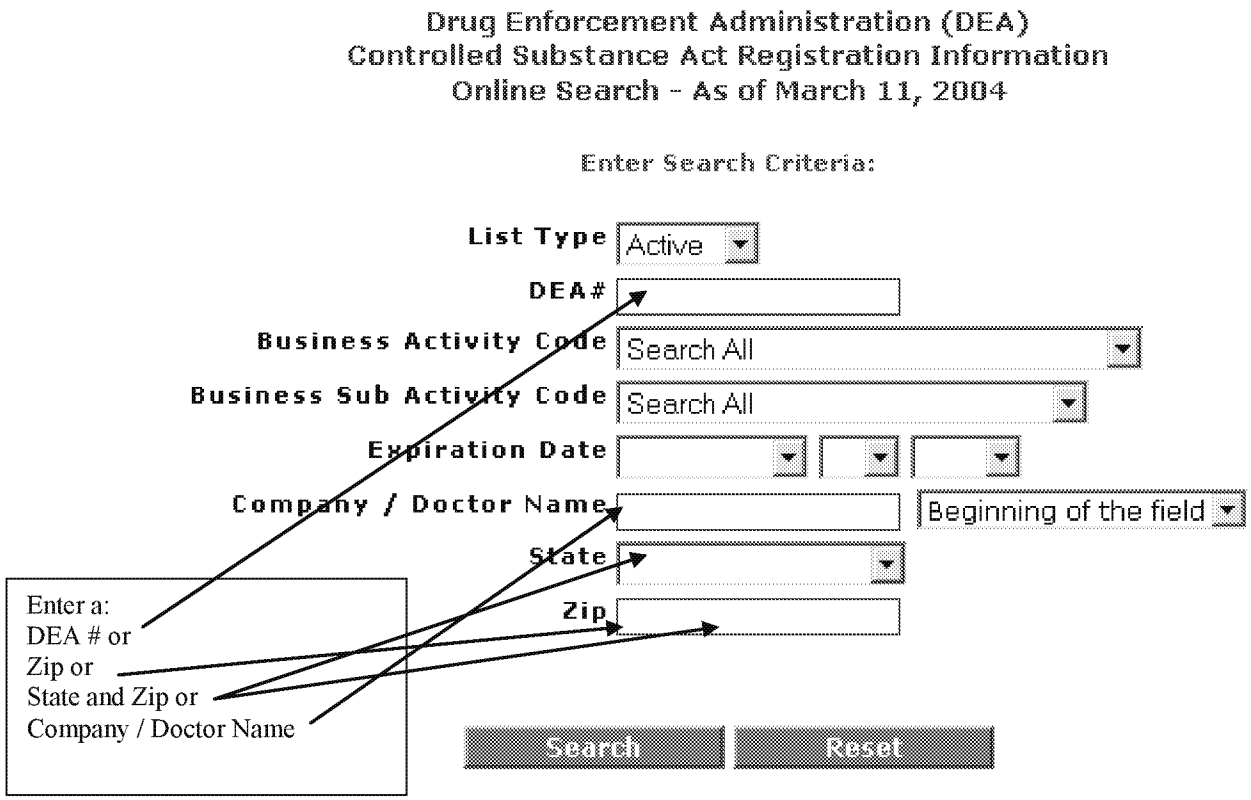

Exhibit B – NTIS continued…

DEA Number	Exp. Date	Company Name	State	Zip
AC0393734	8/31/2005	CITY PHARMACY INC	TN	37745
AT7665637	11/30/2005	SUSONG PHARMACY	TN	37745
BS0143850	2/28/2007	STUMM, HARRY J MD	TN	37745
BP3389093	3/31/2007	PATTERSON, MARK DAVID MD	TN	37745
MM0369365	1/31/2005	MCMILLIAN, JEFFREY OD	TN	37745
MR0852081	4/30/2005	ROBBINS, MELISSA A FNP	TN	37745
MM0467426	1/31/2006	MORRISON, REBECCA A PNP	TN	37745
MP0551033	3/31/2006	PACE, NANCY L NP	TN	37745
MC0649472	8/31/2006	CARRINO, THOMAS PA	TN	37745
BW8300220	5/31/2004	WALGREEN CO	TN	37745
BT4966288	11/30/2004	THE MEDICINE SHOPPE	TN	37745
AC0401202	12/31/2004	REVCO DISCOUNT DRUG CTRS, INC	TN	37745
AR8276405	12/31/2004	REVCO DISCOUNT DRUG CTRS, INC	TN	37745
BF8029589	9/30/2005	FOOD CITY PHARMACY #606	TN	37745
BH2489032	10/31/2005	HOWARD'S PHARMACY	TN	37745
BR3339618	6/30/2006	RITE AID OF TENNESSEE INC	TN	37745
BG8618689	9/30/2006	GREENE COUNTY DRUG STORE, LLC	TN	37745

Select the hyperlink that matches the DEA information you are searching for.

Exhibit B – NTIS continued…

Current Date: 3/15/2004 **Data File Release Date:** March 11, 2004

Drug Enforcement Administration (DEA) Datafiles -Both

Registrant Profile

for

CITY PHARMACY INC	
Address:	113 E CHURCH ST GREENEVILLE, TN 37745
State / Zip:	TN 37745
DEA Number:	AC0393734
Business Activity Code:	A
Drug Schedule:	22N 33N 4 5
Expiration Date:	8/31/2005

Print Close

Exhibit C – DEA Renewal Letter

A Watson Pharma, Inc.

A subsidiary of Watson Laboratories, Inc.

<today's date>

<CustomerName1>
<CustomerName2>
<Customer Address1>
<Customer Address2>
<City>, <ST> <Zip code>

Attention: Compliance Department
Subject: DEA Certificate *number* ***<DEA number>***

Dear Compliance Department:

It has come to our attention that the DEA Registration Certificate that we have on file for you is about to expire.

It is important that we have a current DEA Registration Certificate from you in order to prevent delays in processing your orders.

Please forward a copy of your DEA Registration Certificate to my attention in the Customer Service department at Watson Pharma, Inc. If you wish you may fax a copy of the certificate to (800) 760-9224, Attention: Jean Norwood.

Your immediate attention to this matter will be greatly appreciated.

If you have any questions regarding this matter, please do not hesitate to contact me at extension 8544.

Sincerely,

Licensing Administrator
Watson Pharma, Inc.
360 Mt. Kemble Ave.
Morristown, NJ 07960
Tel: 973 –XXX-XXXX
Fax: 800-760-9224