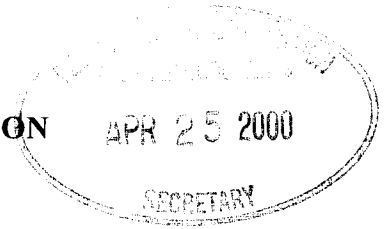


UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION



In the Matter of

Hoechst Marion Roussel, Inc., et al.,

Respondents

Docket No. 9293

CARDERM CAPITAL, L.P.'S INITIAL DISCLOSURES

In accordance with § 3.31(b) of the Commission's Rule of Practice, 16 C.F.R. § 3.31(b), respondent Carderm Capital, L.P. ("Respondent") hereby provides its initial disclosures. These disclosures are based on information currently known to Respondent and are subject to supplementation to the extent additional information becomes available.

Under Commission Rule 3.31(b), parties are to provide certain disclosures with respect to information and documents "relevant to the allegation of the Commission's complaint." The Complaint fails to allege certain facts with particularity. Especially given the lack of particularity in the Complaint, Respondent's inability to address herein any aspect of, or allegation in, the Complaint in a specific fashion is not meant to indicate that Respondent in any way admits or fails to dispute any such allegation, except to the extent provided in Respondent's Answer.

Set forth below are: (1) the names of individuals likely to have discoverable information relevant to the allegations of the Complaint, to the proposed relief, or to the defenses of the Respondents; and (2) a description of the category and location of documents, data compilations and tangible things in our possession, custody or control that are relevant to the allegations of the Complaint, to the proposed relief, or to the defenses of the Respondents, excluding

privileged material, trial preparation material, material that pertains to experts, and material that is obtainable from some other source that is more convenient, less burdensome or less expensive. This information is provided to the extent that it is known.

I. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION

The Complaint alleges that Respondent has acted in a manner violative of Section 5 of the Federal Trade Commission Act. Respondent denies those allegations.

Subject to the foregoing, Respondent identifies the following persons pursuant to Commission Rule 3.31(b)(1):

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France
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United States Food & Drug Administration
Office of the General Counsel, Office of Generic Drugs, or other
Divisions of the Food & Drug Administration
5600 Fisher's Lane
Rockville, MD 20857

United States Patent and Trademark Office
Crystal Park II
2121 Crystal Drive
Arlington, VA 22202
(703) 308-4357

Watson Laboratories Inc.
311 Bonine Circle
Corona, CA 91720
(800) 272-5525

John Zawad
Aventis Pharmaceuticals Inc.
Route 202-206
P.O. Box 6800
Bridgewater, NJ 08876-1258
(908) 231-3770

II. RELEVANT DOCUMENTS

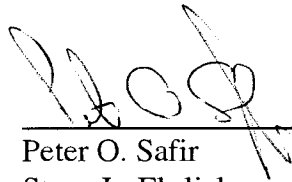
The documents, data compilations, and tangible things in our possession, custody, or control that are relevant to the allegations of the Complaint, to the proposed relief, or to the defenses of the Respondents fall into two categories: (1) documents provided to the Commission during the course of the Section 5 investigation, FTC File. No. 981-0368; and (2) documents obtained following the submission of the executed verification.

In addition, documents relevant to the allegations of the Complaint and Respondent's defenses are included within the case files of *Hoechst Marion Roussel, Inc. et al. v. Andrx Pharmaceuticals, Inc.*, Case No. 96-06121-Civ-Roettger (S.D. Fla.); *Hoechst Marion Roussel, Inc. et al. v. Faulding*, Case No. 97-05126 (D. N.J.); and *Biovail Corporation v. Hoechst A.G. et al.*, Case

No. 98-1434 (D. N.J.). Portions of these documents were previously provided to the Commission staff by Aventis Pharmaceuticals, Inc., formerly known as Hoechst Marion Roussel, Inc., in response to a subpoena issued to it by the Commission in File No. 981-09368. Materials produced by the parties in these cases are subject to protective orders.

Dated: April 25, 2000

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Peter O. Safir', is written over a horizontal line. The signature is stylized and somewhat cursive.

Peter O. Safir
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(202) 223-5120

Attorneys for Respondent
Carderm Capital, L.P.

CERTIFICATE OF SERVICE

I, Stacy L. Ehrlich, hereby certify that on April 25, 2000, I caused a copy of the Initial Disclosures of Carderm Capital, L.P., to be served upon the following persons by Federal Express:

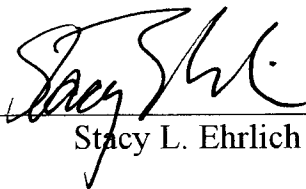
Hon. D. Michael Chappel
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