

**UNITED STATES OF AMERICA
BEFORE FEDERAL TRADE COMMISSION**

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In the Matter of)
)
Schering-Plough Corporation,)
a corporation,) Docket No. 9297
)
Upsher-Smith Laboratories,)
a corporation,)
)
and)
)
American Home Products Corporation,)
a corporation.)
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**RESPONDENT AMERICAN HOME PRODUCTS CORPORATION'S
MOTION FOR LEAVE TO FILE A REPLY TO COMPLAINT COUNSEL'S
OPPOSITION TO AHP'S MOTION TO QUASH TWO SUBPEONAS AD
TESTIFICANDUM SERVED ON AHP AFTER AHP'S WITHDRAWAL FROM
ADJUDICATION AND, IN THE ALTERNATIVE, FOR PROTECTIVE ORDER**

Pursuant to § 3.22(c) of the Federal Trade Commission Rules of Practice for Adjudicatory Proceedings, third-party American Home Products Corporation (“AHP”) hereby respectfully requests leave to file a short reply in support of its Motion to Quash Two Subpoenas *Ad Testificandum* Served on AHP After AHP’s Withdrawal from Adjudication and, in the Alternative, for Protective Order. The proposed 3-page reply memorandum is limited to demonstrating why complaint counsel are incorrect when they argue that the alternative relief sought by AHP – a protective order limiting the scope and time of the depositions – is “unreasonable and unworkable.”

Dated: November 7, 2001

Respectfully submitted,

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