

1. Approximately 1 percent of the population of the United States or 2.4 million people, suffer from schizophrenia.

Answer:

Caremark admits that published reports in its possession support the statement made in request 1.

2. Approximately 1.7 million schizophrenia patients are hospitalized annually for treatment.

Answer:

After having made reasonable inquiry, Caremark is unable to admit or deny the statement made in request 2 based on the information known or readily obtainable by it.

3. Approximately 25 percent of all beds used for any medical treatment in the United States are used by schizophrenia patients.

Answer:

Caremark admits that published reports in its possession support the statement in request 3.

4. Medical costs in the United States for the treatment of schizophrenia are approximately \$40 billion annually.

Answer:

After having made reasonable inquiry, Caremark is unable to admit or deny the statement made in request 4 based on the information known or readily obtainable by it.

5. At least 80 percent of the institutionalized patients identified by Sandoz as suitable candidates for Clozaril treatment are treated at public expense.

Answer:

After having made reasonable inquiry, Caremark is unable to admit or deny the statement made in request 5 based on the information known or readily obtainable by it.

6. The overwhelming majority of in-patients treated for schizophrenia are treated in state funded and operated institutions.

Answer:

Caremark admits that published reports in its possession support the statement that the majority of in-patients treated for schizophrenia are treated in state funded and operated institutions. Except as so admitted and stated, after having made reasonable inquiry, Caremark is unable to admit or deny the statement made in request 6 as to "overwhelming majority" based on the information known or readily obtainable by it.

7. Agranulocytosis and leukopenia have been identified as side effects of other drugs, including "standard use of neuroleptics, penicillin, ibuprofen, and many other commonly used drugs."

Answer:

Caremark admits that leukopenia and agranulocytosis have been identified as side effects of other drugs, but denies that the incident rate of leukopenia and agranulocytosis associated with the "standard use of neuroleptics, penicillin, ibuprofen, and many other commonly used drugs" is as high as the incident rate associated with the use of CLOZARIL®.

8. Pharmacists monitor for side effects and adverse interactions among drugs.

Answer:

Caremark admits that pharmacists check for drug incompatibilities but denies that pharmacists "monitor for side effects and adverse interactions among drugs" in the manner or to the extent that Caremark monitors white blood cell counts of CLOZARIL® patients pursuant to the CLOZARIL® Patient Management System™ ("CPMS").

9. Even though schizophrenia patients receive a variety of treatments, including treatments with several drugs, CPMS focuses solely on one drug side effect (agranulocytosis) of one drug (Clozaril).

Answer:

Caremark admits that CPMS includes weekly blood testing to monitor white blood cell counts of CLOZARIL® patients. Except as so admitted and stated, Caremark, after having made reasonable inquiry, is unable to admit or deny the statement made in request 9 based on the information known or readily obtainable by it.

10. Because the services provided under CPMS do not include the monitoring of other potentially fatal side effects or conditions, schizophrenia patients receiving Clozaril must still be monitored by their primary care physicians.

Answer:

Caremark admits that CPMS includes weekly blood testing to monitor white blood cell counts of CLOZARIL® patients. Caremark further admits that "schizophrenia patients receiving Clozaril" may require medical care in addition to weekly blood testing to monitor white blood cell counts. Except as so admitted and stated, Caremark denies the statements made in request 10.

11. Clozapine treatment is vastly superior to treatment with standard neuroleptics for many schizophrenia patients.

Answer:

Caremark admits that Clozapine treatment is effective in treating certain schizophrenia patients who have failed to respond to other anti-psychotic drugs. Except as so admitted and stated, Caremark, after having made reasonable inquiry, is unable to admit or deny the remaining statements made in request 11 based on the information known or readily obtainable by it.

12. Clozapine relieves symptoms of schizophrenia that are not relieved by any other treatment.

Answer:

Caremark admits that for some patients Clozapine relieves symptoms of schizophrenia that are not relieved by any other treatment. Except as so admitted and stated, Caremark, after having made reasonable inquiry, is unable to admit or deny the remaining statements made in request 12 based on the information known or readily obtainable by it.

Respectfully submitted,



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