

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA, EX REL.
YOASH GOHIL

Plaintiff/Relator

v.

SANOFI U.S. SERVICES, INC. et al.,

Defendants.

CIVIL ACTION NO. 02-2964 (LFS)

ORDER

AND NOW, on this _____ day of _____, 2017, upon consideration of Plaintiff's Motion to Compel Discovery, it is hereby **ORDERED** that Plaintiff's Motion is **GRANTED** and Defendants shall produce, within forty-five (45) days of the filing of this **ORDER**:

1. All documents and data showing Aventis management's knowledge of the off-label marketing of Nasacort and Lovenox, including, but not limited to, complaints or reports of off-label marketing, investigations of complaints or reports of off-label marketing, audits of off-label marketing, compliance investigations of off-label marketing, and physician surveys or reports.
2. All documents related to any Aventis corporate compliance plan or program.
3. All documents concerning Aventis's compliance work plans, action plans, monitoring plans, or any other plan concerning compliance with laws or regulations.
4. All documents concerning complaints of any Aventis employee made in connection with claims that Aventis was not complying with laws or regulations concerning the marketing and selling of any drug, including, but not limited to, Laurie Babb, Jane Chin, and Michael Ward.
5. All documents concerning any investigations, audits, or reviews conducted by Aventis into any complaints of Aventis employees made in connection with claims that Aventis was not complying with laws or regulations, including, but not limited to, Laurie Babb, Jane Chin, and Michael Ward.

IT IS FURTHER ORDERED that for purposes of all future discovery conducted in this matter, Aventis shall not withhold any documents or testimony from Plaintiff on the basis that the documents or testimony pertain to drugs other than Taxotere in connection with these requests.

BY THE COURT

Hon. Lawrence F. Stengel, U.S.D.J.