

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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IN RE VITAMINS ANTITRUST LITIGATION :
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This document relates to: :
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American Home Products Corp. v. F. Hoffmann-La : Misc. No. 99-197 (TFH)
Roche Ltd, et al., Case No. 00-Civ-3117 (S.D.N.Y.) : (M.D.L. No. 1285)
:
Archer Daniels Midland Company v. F. Hoffmann- :
La Roche Ltd, et al., Case No. 00C2185 (N.D. Ill.) :
:
Bayer Corporation v. F. Hoffmann-La Roche Ltd, et :
al., Case No. 00-Civ-2329 (S.D.N.Y.) :
:
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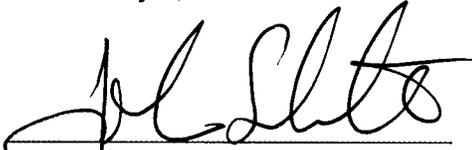
MAY 02 2001

NANCY MAYER WHITTINGTON, CLERK
U.S. DISTRICT COURT

JFH
STIPULATION AND (PROPOSED) ORDER REGARDING BRIEFING
SCHEDULE FOR PLAINTIFFS AHP, ADM AND BAYER ON JOINT MOTION
OF CERTAIN DEFENDANTS TO DISMISS PLAINTIFFS' CLAIMS BASED ON
TRANSACTIONS IN FOREIGN COMMERCE OR BY PLAINTIFFS' AFFILIATES

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned,
that any opposition by plaintiffs American Home Products Corp., Archer Daniels Midland
Company and Bayer Corporation (the "Stipulating Plaintiffs") to the Joint Motion Of
Certain Defendants To Dismiss Plaintiffs' Claims Based On Transactions In Foreign
Commerce Or By Plaintiffs' Affiliates (the "Motion") shall be continued pending the
resolution of discussions between the parties that may obviate the need for further
prosecution of the Motion as to the Stipulating Plaintiffs. Should it become necessary, the
parties hereto shall, after due consultation, propose new dates for the Court's approval for
any oppositions to the Motion by the Stipulating Plaintiffs, as well as any replies thereto.

Dated: May 1, 2001



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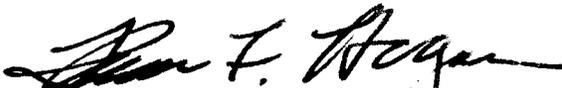


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*Counsel for Plaintiffs American Home
Products Corp., Archer Daniels Midland
Company and Bayer Corporation*

*Counsel for Defendant F. Hoffmann-La Roche Ltd
and, for purposes of this stipulation, on behalf of
Defendants Hoffmann-La Roche Inc., Roche
Vitamins Inc., BASF AG, BASF Corporation,
Aventis S.A. (f/k/a Rhône-Poulenc S.A.), Aventis
Animal Nutrition S.A., Rhône-Poulenc Animal
Nutrition Inc., Rhône-Poulenc Inc., Hoechst
Marion Roussel S.A., Takeda Chemical Industries,
Ltd., Takeda Vitamin & Food USA, Inc., Takeda
U.S.A., Inc., Takeda America, Inc., Daiichi
Pharmaceutical Co., Ltd., Daiichi
Pharmaceutical Corporation, Daiichi Fine
Chemicals, Inc., Eisai Co., Ltd., Eisai U.S.A., Inc.,
Eisai Inc., Lonza AG, Lonza Inc., Bioproducts
Incorporated, Degussa AG (f/k/a Degussa-Hüls
AG), Degussa-Hüls Corporation, DuCoa, L.P.,
DCV, Inc., E.I. duPont de Nemours and Company,
EM Industries, Inc., Merck KGaA, E. Merck,
Mitsui & Co., Ltd., Nepera Inc., Reilly Chemicals,
S.A., Reilly Industries, Inc., Sumitomo Chemical
America, Inc., Tanabe U.S.A., Inc., UCB
Chemicals Corporation and UCB, Inc.*

SO ORDERED:



THOMAS F. HOGAN
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on May 1, 2001, a true and correct copy of the foregoing **Stipulation and (Proposed) Order Regarding Briefing Schedule for Plaintiffs AHP, ADM and Bayer on Joint Motion of Certain Defendants to Dismiss Plaintiffs' Claims Based on Transactions in Foreign Commerce or by Plaintiffs' Affiliates** was sent to Verilaw for electronic service pursuant to the Court's May 17, 2000 Order to all counsel of record.



John E. Schmidlein