

this Stipulation. In the event that the producing party discovers that a specific document so designated on an exhibit list is not, in fact, authentic or genuine, that it is incomplete, that it includes pages that are not part of the document, or that it does not constitute a Fed. R. Evid. 803(6) business record, that party shall be permitted to withdraw its stipulation as to that particular document. After written notification of withdrawal of the stipulation and objection to authenticity, the opposing party shall have the right to direct appropriate supplemental discovery requests, including requests for depositions in Washington DC, limited to the issue of the authenticity, genuineness, completeness or business record nature of the withdrawn document. Consistent with Local Civil Rule 16.5(b)(6), exhibits will be presumed authentic unless objected to and the objection is sustained.

4. Nothing in this Stipulation establishes the admissibility of any document, nor shall be taken to mean that any party has accepted any characterization other than those to which the parties have specifically stipulated.

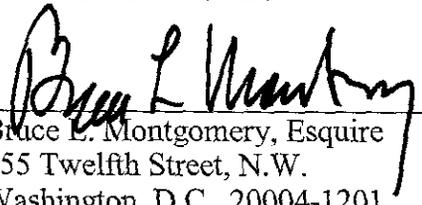
5. In addition, this Stipulation does not apply to any document that, although produced by a stipulating party is specifically identified within ten (10) days of the parties' exchange of exhibit lists as having not been (1) generated or created by the producing party or (2) produced from the producing party's files (such as the "Mendoza/Sommer" documents produced by Roche Vitamins, Inc.). The parties reserve their respective rights with respect to the authenticity and admissibility of these documents but agree that if such documents are so identified after the exchange of exhibit lists, the opposing party shall have the right to direct appropriate supplemental discovery requests, including requests for depositions in Washington DC, limited to the issue of the authenticity, genuineness, completeness or business record nature of the withdrawn document. Consistent with Local Civil Rule

16.5(b)(6), exhibits will be presumed authentic unless objected to and the objection is sustained.

6. The parties also agree that no party waives any defense based on jurisdiction or service of process.

Dated: February 12, 2002

ARNOLD & PORTER

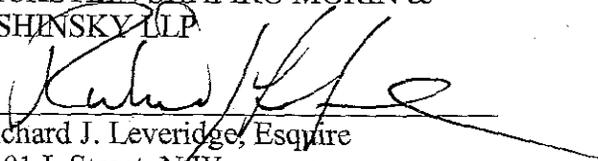

Bruce L. Montgomery, Esquire
555 Twelfth Street, N.W.
Washington, D.C. 20004-1201

(202) 942-5679

*On behalf of certain Non-Choline Chloride
Defendants for Purpose of this Stipulation*

Respectfully submitted,

DICKSTEIN SHAPIRO MORIN &
OSHENSKY LLP


Richard J. Leveridge, Esquire
2101 L Street, N.W.
Washington, D.C. 20037-1526

(202) 785-9700

*On behalf of all Plaintiffs for Purposes of this
Stipulation*

SO ORDERED:


The Honorable Thomas F. Hogan
United States District Judge

Dated: 2/14/02