

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

_____)	
In the Matter of)	
)	
Schering-Plough Corporation,)	
a corporation,)	Docket No. 9297
)	
Upsher-Smith Laboratories, Inc.,)	
a corporation,)	
)	
and)	
)	
American Home Products Corporation,)	
a corporation.)	
_____)	

**AMERICAN HOME PRODUCTS CORPORATION’S MOTION TO
QUASH TWO SUBPOENAS *AD TESTIFICANDUM* SERVED ON
AHP AFTER AHP’S WITHDRAWAL FROM ADJUDICATION
AND, IN THE ALTERNATIVE, FOR PROTECTIVE ORDER**

Pursuant to Rule 3.34(c) of the Federal Trade Commission’s Rules of Practice, 16 C.F.R. § 3.34(c), American Home Products Corporation (“AHP”) respectfully moves to quash two subpoenas *ad testificandum* served on it by complaint counsel. In the alternative, pursuant to 16 C.F.R. § 3.31(d), AHP moves for a protective order limiting any depositions to new subject matter raised after the investigational hearings and to two hours in duration. The grounds for this motion are set forth in the attached memorandum.

Respectfully submitted,

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