UNITED STATES OF AMERICA BEFORE FEDERAL TRADE COMMISSION

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In the Matter of

HOECHST MARION ROUSSEL, INC., a corporation,

CARDERM CAPITAL L.P., a limited partnership,

and

ANDRX CORPORATION, a corporation.

Docket No. 9293

TO: The Honorable D. Michael Chappel Administrative Law Judge

JOINT MOTION FOR LEAVE TO FILE MOTIONS TO COMPEL CERTAIN DISCOVERY

Pursuant to Rule 3.22(c) of the Federal Trade Commission Rules of Practice for Adjudicatory Proceedings, complaint counsel and Aventis Pharmaceuticals, Inc. respectfully request leave to file the following motions to compel on November 13, 2000: (1) Complaint Counsel's Motion to Compel Aventis' Response to Requests for Admissions; (2) Aventis' Motion to Compel Complaint Counsel's Response to Admissions; and (3) Aventis' Motion to Compel Complaint Counsel's Response to Interrogatories. Under the Scheduling Order, these motions would be due no later than November 7.

The parties have been discussing narrowing the scope of the various issues relating to

these motions and expect to complete these discussions by November 9. Accordingly, we seek leave to file the respective motions on the next business day, November 13.

Respectfully Submitted,

Markus H. Meier

Martin Mus

Counsel Supporting the Complaint

Bureau of Competition Federal Trade Commission Washington, D.C. 20580 Michael Koon Koon

Counsel for Aventis

Shook, Hardy & Bacon, L.L.P. 600 14th Street, N.W. Suite 800 Washington, DC 20005-2004

Dated: November 8, 2000

CERTIFICATE OF SERVICE

I, Robin L. Moore, hereby certify that on November 8, 2000, I caused a copy of the Joint Motion for Leave to File Motions to Compel Certain Discovery to be served upon the following persons by Federal Express.

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