



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

MAR 10 2009

Office of the Director
Bureau of Competition

Alan Kusnitz, Esq.
Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153

Re: *UCB Pharma Inc./Keppra*, FTC File No. 081-0031

Dear Mr. Kusnitz:

The Federal Trade Commission's Bureau of Competition conducted a nonpublic investigation to determine whether your client, Cobalt Laboratories, Inc., had engaged or was engaging in, unfair methods of competition in or affecting commerce in violation of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, as amended, with respect to the sale of Keppra or its generic equivalents.

Upon reviewing this matter, it now appears that no additional action is warranted by the Commission at this time. Accordingly, the investigation has been closed. This action is not to be construed as a determination that a violation may not have occurred, just as the pendency of an investigation should not be construed as a determination that a violation has occurred. The Commission reserves the right to take such further action as the public interest may require.

Sincerely yours,

A handwritten signature in black ink, appearing to read "D. Wales, Jr.", with a long horizontal flourish extending to the right.

David P. Wales, Jr.
Acting Director