# UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

	)		
UNITED STATES OF AMERICA,	)		
Plaintiff,	)	Civil Action No. 99-005	(MMS)
	)		
VS.	)		
	)		
DENTSPLY INTERNATIONAL, INC.,	)		
	)		
Defendant.	)		
	)		

## PLAINTIFF'S RULE 26(a)(1) INITIAL DISCLOSURES

Pursuant to Fed. R. Civ. P. 26(a), plaintiff the United States of America hereby serves these Initial Disclosures to Defendant. Appendix A to these disclosures identifies those individuals who may have discoverable information relevant to disputed facts alleged with particularity in the pleadings. Appendix B to these disclosures describes the documents, data compilations, and tangible things held by the Antitrust Division that may be relevant to disputed facts alleged with particularity in the pleadings.

These disclosures do not include the names of any potential experts retained or consulted by the United States. The United States will produce information relating to experts as may be appropriate under Federal Rule of Civil Procedure 26(a)(2) at the times provided by that Rule or any supervening order of the Court. In addition, the disclosures do not include names of current or former officers, directors, or employees of Dentsply, nor do they include documents produced by Dentsply.

These disclosures do not constitute waiver of any work product protection and are without prejudice to any other issue or argument.

DATED: February 17, 1999

COUNSEL FOR PLAINTIFF UNITED STATES OF AMERICA

/<sub>S</sub>/

Mark J. Botti
William E. Berlin
Jean Lin
Michael S. Spector
Michael D. Farber
United States Department of Justice
Antitrust Division
325 Seventh Street, N.W., Suite 400
Washington, DC 20530
(202) 307-0827

RICHARD G. ANDREWS UNITED STATES ATTORNEY

Judith M. Kinney (DSB #3643) Assistant United States Attorney 1201 Market Street, Suite 1100 Wilmington, DE 19801 (302) 573-6277

#### APPENDIX A

A. Individuals who may have discoverable information relevant to disputed facts alleged with particularity in the pleadings.

Attached is a list of individuals who may have discoverable information relevant to disputed facts alleged with particularity in the pleadings. The list is divided into five categories. The categories and the subjects of discoverable information, possessed by the individuals within each category, are listed below:

 Individuals associated with **DEALERS** of prefabricated artificial teeth and/or other dental products

Possess information relating to: differences between different types of dealers<sup>1</sup>; business relationship of each type of dealer with Dentsply and/or other manufacturers of dental products; services provided to laboratories by some types of dealers; services provided to dentists by other types of dealers; and/or requirements and preferences of laboratories in purchasing prefabricated artificial teeth.

2. <u>Individuals associated with MANUFACTURERS of prefabricated artificial teeth and/or other dental products</u>

Possess information relating to: business relationship of manufacturers with dealers; services provided by dealers to manufacturers and laboratories; the market for the manufacture, distribution, and sale of prefabricated artificial teeth and other dental products; differentiation of prefabricated teeth by quality, cost, and materials; competition with Dentsply and each

<sup>&</sup>lt;sup>1</sup> While dealers have been grouped, for convenience, under one heading, this does not indicate that dealers are interchangeable. In fact, as explained in the Complaint, there are significant differences among dealers.

other in the United States and abroad; and/or effect on manufacturers of Dentsply's practices, policies, and relationships with dealers.

### 3. Individuals associated with dental **LABORATORIES**

Possess information relating to: business relationship of laboratories with dealers; preferences and requirements of laboratories purchasing prefabricated artificial teeth and other dental products; preferences and requirements of dentists purchasing dentures and other dental products; and/or services provided to laboratories by dealers.

4. <u>Individuals associated with TRADE ASSOCIATIONS AND DENTAL SCHOOLS</u>

Possess information relating to: the market for prefabricated artificial teeth and other dental products; the relationship of manufacturers, dealers, laboratories, and dentists in the markets for prefabricated artificial teeth and other dental products; and/or differentiation of prefabricated artificial teeth by quality, cost, and materials.

## 5. Individuals associated with **FOREIGN GOVERNMENTAL ORGANIZATIONS**

Possess information relating to: the market for prefabricated artificial teeth and other dental products outside of the United States; distribution and sale of prefabricated artificial teeth and other dental products outside of the United States; and/or competition between Dentsply and other manufacturers of prefabricated artificial teeth outside of the United States.

#### **DEALERS**

1. Name: Steven Richard Desautel (Vice President and General Manager)

Company: Accu Bite Dental Supply Address: 2 Industrial Park Drive

Williamston, MI 48895

2. Name: Jeff Wells

> Company: Adium Dental Products, Inc.

Address: 3301 Olive Avenue

Long Beach, CA 90807

Telephone: (310) 595-5693

(800) 892-2144

3. Name: Larry Greenfeld

> Company: Alvy Dental Supply

Address: Nutley, NJ Telephone: (201) 667-3391

4. Name: Jim Moubarak

> Company: AM Dental Supply Address: 16215 North Freeway

> > Houston, TX 77090

Telephone: (713) 893-8573

5. Name: Janet Dailey

> Company: Americana Dental

Address: Tampa, FL (813) 888-8889 Telephone:

6. Joy Chew Name:

> Company: Ami Dental Address: Houston, TX Telephone: (713) 777-3422

7. Name: Betsy Harris (Manager of Tooth and Gold Department)

Company: Atlanta Dental Supply Address: 3080 Presidential Drive

Atlanta, GA 30340

Telephone: (404) 329-6317

Counsel: Ronald Raven and John C. Williams

Williams & Williams

1612 Northeast Express Way

Atlanta, GA 30329 (404) 325-9630

8. Name: Gerry Archer

Company: Barr Dental Address: Medford, OR Telephone: (541) 779-2001

9. Name: Fred Cyker

Company: Barton-Cyker Dental

Address: Windsor, CT Telephone: (860) 683-2923

10. Name: Barry Salzman

Company: Becker-Parkin Dental Equipment & Supply Co.

Address: New York, NY Telephone: (516) 364-7500 Counsel: Leonard Weber

11. Company: Bee Bee's Hive Inc.

Address: 424 SW 22nd Avenue

Miami, FL 33135-3195

Telephone: (305) 643-3044

12. Name: Chip Yu

Company: CDS Dental Supply

Address: Anaheim, CA Telephone: (714) 666-8563

13. Name: Leah

Company: Conger Dental

Address: 1917 SW Gage Blvd.

Topeka, KS 66604

Telephone: (800) 255-3983

14. Company: Continental Dental

Address: 5119 N. 19th Avenue, Suite B

Phoenix, AZ 85015

Telephone: (602) 246-7951

15. Name: Jeffrey Libman (formerly Florida Regional Manager for Outside Sales)

Company: Darby Dental Lab Supply Company Inc.

Address: 3890 Park Central Blvd. North

Pompano Beach, FL 33064

Counsel: Richard P. Romeo

Salon, Marrow & Dyckman

685 Third Avenue New York, NY 10017 (212) 661-7100, ext. 206

16. Name: Sidney Nordhauser (General Manager)

Company: Darby Dental Lab Supply Company Inc.

Address: 865 Merrick Avenue

Westbury, NY 11590

Telephone: (800) 826-6050

(516) 683-1619, ext. 2601

Counsel: Richard P. Romeo

Salon, Marrow & Dyckman

685 Third Avenue New York, NY 10017 (212) 661-7100, ext. 206

17. Name: Art Stengel

Company: Dart Dental Supply

Address: Hamden, CT Telephone: (203) 287-1106

18. Name: David Torosian (President & Owner)

Company: Davis Dental Supply Address: 13120 Saticoy Blvd.

N. Hollywood, CA 91605

Telephone: (818) 765-4994

19. Name: Carroll Young

Company: Dental Distributers

Address: 10387 Gandy

St. Petersburg, FL

Telephone: (813) 576-0553

20. Name: Regis G. Vetrano (General Manager)

Company: Dental Laboratory Discount Supply

Address: 810 East Main Street

Branford, CT 06405

Telephone: (203) 483-3875 Counsel: Martha Gifford

Proskauer, Rose, Goetz & Mendelsohn

1585 Broadway

New York, NY 10036

(212) 969-3490

21. Name: Karen

Company: Dental Technicians Supply Address: 30 Nassau Terminal Road

New Hyde Park, NY 11040

Telephone: (800) 247-2385

22. Name: Robert Raths (Former President)

Company: Dental Technicians Supply Address: 30 Nassau Terminal Road

New Hyde Park, NY 11040

Telephone: (800) 343-3445

(800) 844-2040

23. Name: Lenny Heller (Domestic Manager)

Company: Dentorium Products Company, Inc.

Address: 18 West 21st Street

New York, NY 10010

Telephone: (212) 242-6931

Counsel: Nathan Newman (Vice President and General Counsel)

18 West 21st Street New York, NY 10010

(212) 242-6931

24. Name: George Martin (President)

Company: Dentorium Products Company, Inc.

Address: 18 West 21st Street

New York, NY 10010

Telephone: (212) 242-6931

Counsel: Nathan Newman (Vice President and General Counsel)

18 West 21st Street New York, NY 10010

(212) 242-6931

25. Name: Dee Stagner

Company: Direct Dental Address: Sparks, NV Telephone: (702) 331-4300

26. Name: Thomas Cavanagh (Former President)

Company: Frink Dental

Address: 1771 Commerce Drive

Elk Grove Village, IL 60007

Telephone: (708) 364-1800

(708) 952-0364

Counsel: Martha Gifford

Proskauer, Rose, Goetz & Mendelsohn

1585 Broadway

New York, NY 10036

(212) 969-3490

27. Name: Irwin

Company: Global Dental Supply Address: Lakewood, NJ 08701

28. Name: John Jankowiak

Company: Great Lakes Orthodontics

Address: Tonawanda, NY Telephone: (716) 695-6251

29. Name: Paul A. Guggenheim (President)

Company: Guggenheim Dental Supply

Address: 12619 Daphne Avenue

Hawthorne, CA 90250

Telephone: (213) 757-1571

30. Name: Saul Shernowitz

Company: Island Dental Supply

Address: Hauppauge, NY Telephone: (516) 231-5800

31. Name: Kay Anderson

Company: Jack Silcox

Address: Brecksville, OH

32. Name: LeVon McGalliard

Company: Jahn Dental Address: San Antonio, TX Telephone: (210) 227-2383

33. Name: Martin Keane

Company: Keane Dental Supply

Address: Toledo, OH Telephone: (419) 473-3032

34. Name: Morton Spatz (President)

Company: Lincoln Dental

Address: 616 Hollywood Avenue

Cherry Hill, NJ 08002

Telephone: (609) 488-1333

(800) 289-6678

Counsel: Leslie H. Spatz

1800 Callowhill Street Philadelphia, PA 19130

35. Name: Cliff Marsh

Company: Marsh Dental Address: Hackensack, NJ Telephone: (201) 487-4472

36. Name: Ann Collings (Manager)

Company: Meer Dental

Address: 7277 North Haggard Road

Canton, MI 48187

Telephone: (313) 454-0300, ext. 224

37. Name: Tim Cluley (Merchandise Manager)

Company: Midwest Dental Supply

Address: Wichita Falls, TX Telephone: (817) 691-4102

38. Name: Carl (General Manager)

Company: Ohio Dental Supply Address: Cincinnati, OH

Telephone: (513) 648-9510

(800) 333-3685

39. Name: Kenneth G. Ott (President)

Company: Ott Dental Supply
Address: 3242 Brighton Road
Pittsburgh, PA 15212

Telephone: (412) 766-6268

40. Name: Robert Cherkas

Company: Parkway Dental Address: Pennsauken, NJ Telephone: (609) 488-1120

41. Name: James Wiltz (President)

Company: Patterson Dental Company
Address: 1031 Mendota Heights Road

St. Paul, MN 55120

Counsel: Jeffrey F. Shaw

Briggs & Morgan

2200 First National Bank Building

St. Paul, MN 55101 (652) 223-6565

42. Name: Keyhan Kashfian (President and Part-owner)

Company: Pearson Dental Supply, Inc.

Address: 13161 Telfair Avenue

Sylmar, CA 91342

Telephone: (818) 362-2600, ext. 222

43. Name: Tim

Company: Popp Dental Supply Address: 5701 Broad Street

Greendale, WI 53129

Telephone: (414) 421-6595

(414) 282-6440

44. Name: U.V. Everett

Company: Professional Dental Associates

Address: Altamonte, FL Telephone: (407) 332-4776

45. Company: Quality Dental Central

Address: Orlando, FL Telephone: (800) 477-1955 46. Company: Reeve Dental

Address: Titusville, FL 32796 Counsel: Kurt M. Rupert

> Hartzog, Conger & Cason 1600 Bank of Oklahoma Plaza

201 Robert S. Kerr

Oklahoma City, OK 73102

(405) 235-7000

47. Name: Chip Buckley

Company: Smith-Holden Address: Providence, RI Telephone: (401) 331-0742

(800) 877-5806 (branch)

48. Name: Kevin Ackeret (Executive Vice President)

Company: Sullivan Dental

Address: 10920 West Lincoln Avenue

West Allis, WI 53227

Telephone: (414) 321-8881 Counsel: Martha Gifford

Proskauer, Rose, Goetz & Mendelsohn

1585 Broadway

New York, NY 10036

(212) 969-3490

49. Company: Summit Dental Inc.

Address: 180 Brand Avenue

P.O. Box 99

Salem, VA 24153

Telephone: (703) 375-2712

50. Name: Bill Buxton (Owner)

Company: Technical Dental Supply

Address: 170 Main Street

York Plaza

Fredericton, NB E3A1C8

Canada

Telephone: (506) 462-0093

(800) 565-4004

51. Name: Esther J. Buxton

Company: Technical Dental Supply

Address: 170 Main Street

York Plaza

Fredericton, NB E3A1C8

Canada

Telephone: (506) 462-0093

(800) 565-4004

52. Company: Texas Dental Service

Address: San Antonio, TX Telephone: (210) 696-7770

53. Name: Martha Thomas

Company: Thomas Dental Supply Address: Oklahoma City, OK Telephone: (918) 663-4113

54. Name: John Morgano

Company: Trinity Dental Products, Inc. Address: 2600 Keslinger Road, Unit B

P.O. Box 741

Geneva, IL 60134

Telephone: (800) 828-3839

(708) 208-6890(708) 232-1606

55. Name: Pete Morgano

Company: Trinity Dental Products, Inc. Address: 2600 Keslinger Road, Unit B

P.O. Box 741

Geneva, IL 60134

Telephone: (800) 828-3839

(708) 208-6890 (708) 232-1606

56. Name: David Dhuet

Company: Valley Dental Supply Address: 4211 W. Magnolia Blvd.

Burbank, CA 91505

Telephone: (818) 984-0990

57. Name: Sarah

Company: Williams Dental Supply

Address: Worcester, MA Telephone: (508) 752-7879

58. Name: Maurice Mazz (Branch Manager)

Company: Zahn Dental Company, Inc. (a subsidiary of Henry L. Schein Co.)

Address: 135 Duryea Road

Melville, NY 11747-3834

Telephone: (212) 969-3971

(800) 496-9500, ext. 2 (800) 582-2702, ext. 6639

Counsel: Martha Gifford

Proskauer, Rose, Goetz & Mendelsohn

1585 Broadway

New York, NY 10036

(212) 969-3490

59. Name: Norman Weinstock (President)

Company: Zahn Dental Company, Inc. (a subsidiary of Henry L. Schein Co.)

Address: 135 Duryea Road

Melville, NY 11747-3834

Counsel: Martha Gifford

Proskauer, Rose, Goetz & Mendelsohn

1585 Broadway

New York, NY 10036

(212) 969-3490

#### **MANUFACTURERS**

1. Name: Bruno Pozzi (President and CEO)

Company: American Tooth Industries/Justi

Address: 1200 Stellar Drive

Oxnard, CA 93033-2404

Telephone: (805) 487-9868

2. Name: Arthur Schepp (Senior Vice President)

Company: American Tooth Industries/Justi

Address: 1200 Stellar Drive

Oxnard, CA 93033-2404

Telephone: (805) 487-9868

3. Name: Roberto Trada (Vice President in Charge of Production)

Company: American Tooth Industries/Justi

Address: 1200 Stellar Drive

Oxnard, CA 93033-2404

Telephone: (805) 487-9868

4. Name: Gary Berg (President of Lab Products Division)

Company: Austenal Corporation/Myerson-Kenson

Address: 4101 W. 51st Street

Chicago, IL 60632-4287

Telephone: (312) 838-6026

5. Name: Bryan Bremer (CEO of Austenal Corporation and President of Tooth

Division)

Company: Austenal Corporation/Myerson-Kenson

Address: 4101 W. 51st Street

Chicago, IL 60632-4287

Telephone: (312) 838-6026

6. Name: James H. Swartout (Myerson Marketing Manager)

Company: Austenal Corporation/Myerson-Kenson

Address: 4101 W. 51st Street

Chicago, IL 60632-4287

Telephone: (312) 838-6026

(773) 735-0600, ext. 3460

7. Name: Ron Shuman (Vice President)

Company: Fricke International Inc. Address: 208 W. Ridge Road

Villa Park, IL 60181

Telephone: (800) 537-4258

8. Name: Bernard J. Bolka, III (Vice President of Finance and Administration)

Company: Heraeus Kulzer, Inc. Address: 4315 S. Lafayette Blvd.

South Bend, IN 45514-2517

Telephone: (219) 299-6612

9. Name: Kerry Connelly (Group Marketing Manager)

Company: Heraeus Kulzer, Inc.
Address: 4315 S. Lafayette Blvd.

South Bend, IN 45514-2517

10. Name: Bob Foyle (President and Chief Operating Officer)

Company: Heraeus Kulzer, Inc.
Address: 4315 S. Lafayette Blvd.

South Bend, IN 45514-2517

11. Name: Mike Brennan (Vice President of Marketing)

Company: Ivoclar North America, Inc.

Address: 175 Pineview Drive

Amherst, NY 14228

Counsel: Alan S. Korman (Vice President - General Counsel)

175 Pineview Drive Amherst, NY 14228 (716) 691-2280

12. Name: Robert Ganley (President)

Company: Ivoclar North America, Inc.

Address: 175 Pineview Drive

Amherst, NY 14228

Telephone: (716) 691-2200

Counsel: Alan S. Korman (Vice President - General Counsel)

175 Pineview Drive Amherst, NY 14228 (716) 691-2280 13. Name: Jennifer Hamburger (Product Manager of Removable Products)

Company: Ivoclar North America, Inc.

Address: 175 Pineview Drive

Amherst, NY 14228

Counsel: Alan S. Korman (Vice President - General Counsel)

175 Pineview Drive Amherst, NY 14228 (716) 691-2280

14. Name: Tom Kingston (Chief Financial Officer)

Company: Ivoclar North America, Inc.

Address: 175 Pineview Drive

Amherst, NY 14228

Counsel: Alan S. Korman (Vice President - General Counsel)

175 Pineview Drive Amherst, NY 14228 (716) 691-2280

15. Name: Patrick M. Segnere (Vice President of Sales for Laboratory Products)

Company: Ivoclar North America, Inc.

Address: 175 Pineview Drive

Amherst, NY 14228

Telephone: (716) 691-0010

Counsel: Alan S. Korman (Vice President - General Counsel)

175 Pineview Drive Amherst, NY 14228 (716) 691-2280

16. Name: George Stantowski (Vice President of Technology)

Company: Ivoclar North America, Inc.

Address: 175 Pineview Drive

Amherst, NY 14228

Counsel: Alan S. Korman (Vice President - General Counsel)

175 Pineview Drive Amherst, NY 14228 (716) 691-2280 17. Name: Joe Burkhart (Controller)

Company: Universal Dental Division of the Lactona Corporation

Address: 201 Commerce Drive

Montgomeryville, PA 18936

Counsel: Robert M. Stengel

Law Offices of Robert Stengel

182 North Broad Street

P.O. Box 1007

Doylestown, PA 18901

(215) 348-8484

18. Name: Gordon W. Hagler (Former President)

Company: Universal Dental Division of the Lactona Corporation

Address: 201 Commerce Drive

Montgomeryville, PA 18936

Telephone: (215) 368-2000 Counsel: Robert M. Stengel

Law Offices of Robert Stengel

182 North Broad Street

P.O. Box 1007

Doylestown, PA 18901

(215) 348-8484

19. Name: Anthony G. Montemurro (Former President)

Company: Universal Dental Division of the Lactona Corporation

Address: 201 Commerce Drive

Montgomeryville, PA 18936

Telephone: (215) 368-2000 Counsel: Robert M. Stengel

Law Offices of Robert Stengel

182 North Broad Street

P.O. Box 1007

Doylestown, PA 18901

(215) 348-8484

20. Name: Stanley Bryde (Controller)

Company: Vident

Address: 3150 E. Birch Street

Brea, CA 92621

Telephone: (714) 961-6200

Counsel: George R. Baffa, Esq.

Hahn & Hahn

301 East Colorado Blvd., Suite 900

Pasadena, CA 91109-1977

(626) 796-9123

21. Name: George Eages (Products Manager)

Company: Vident

Address: 3150 E. Birch Street

Brea, CA 92621

Telephone: (714) 961-6200

Counsel: George R. Baffa, Esq.

Hahn & Hahn

301 East Colorado Blvd., Suite 900

Pasadena, CA 91109-1977

(626) 796-9123

22. Name: Vern Hale (Vice President Sales and Marketing)

Company: Vident

Address: 3150 E. Birch Street

Brea, CA 92621

Telephone: (714) 961-6200, ext. 220 Counsel: George R. Baffa, Esq.

Hahn & Hahn

301 East Colorado Blvd., Suite 900

Pasadena, CA 91109-1977

(626) 796-9123

23. Name: Jorges Pages (Laboratory Products Manager)

Company: Vident

Address: 3150 E. Birch Street

Brea, CA 92621

Telephone: (714) 961-6200

Counsel: George R. Baffa, Esq.

Hahn & Hahn

301 East Colorado Blvd., Suite 900

Pasadena, CA 91109-1977

(626) 796-9123

24. Name: Wayne W. Whitehill (President)

Company: Vident

Address: 3150 E. Birch Street

Brea, CA 92621

Telephone: (714) 961-6200

Counsel: George R. Baffa, Esq.

Hahn & Hahn

301 East Colorado Blvd., Suite 900

Pasadena, CA 91109-1977

(626) 796-9123

25. Name: Mark De Torre (Marketing Development Manager)

Company: 3M's Dental Products Division Address: 3M Center Bldg., 275-2SE-03

P.O. Box 3275

St. Paul, MN 55133-3275

Telephone: (612) 736-5866 Counsel: Carol L. Bros

3M

Minnesota Mining and Manufacturing Company

P.O. Box 33428

St. Paul, MN 55133-3428

(612) 733-1363

26. Name: Jerry Swanson (Product Development Manager)

Company: 3M's Dental Products Division Address: 3M Center Bldg., 260-28-09 St. Paul, MN 55144-1000

Telephone: (612) 733-7360

Counsel: Carol L. Bros

3M

Minnesota Mining and Manufacturing Company

P.O. Box 33428

St. Paul, MN 55133-3428

(612) 733-1363

#### **LABORATORIES**

1. Name: John Alvarez

Company: AB Precision Dental

Address: 870 N. Linder Road, NE, Suite E

Meridan, ID 83642

Telephone: (208) 888-7401

2. Name: Wayne Murray (Owner)

Company: Acrylic Works Dental Lab

Address: 216 S. Seventh Street, Suite 19

Las Vegas, NV 89101

Telephone: (702) 382-3132

3. Company: American Dental

Address: Covington, KY Telephone: (606) 331-0300

4. Name: Scott

Company: Arizona Implants Address: Temple, AZ

5. Company: Bold Dental Lab

Address: San Leandro, CA Telephone: (415) 352-4224

6. Name: Nip Nguyen

Company: Boos Dental Lab Address: P.O. Box 669

Minneapolis, MN 55411

Telephone: (619) 529-9655

7. Name: Neal Courter (Technician)

Company: Brabant Dental Lab Address: 1616 29th Street, #200

Sacramento, CA 95816

Telephone: (916) 452-7327

8. Name: Chris O'Banks (General Manger)

Company: Brabant Dental Lab Address: 1616 29th Street, #200

Sacramento, CA 95816

Telephone: (916) 452-7327

9. Name: Dell Reeves

Company: Burien Prosthetics

Address: Seattle, WA

10. Name: Peter A. Hartleb, CDT

Company: Cape Coral Dental Labs, Inc.

Address: 4632 Vincennes Blvd.

Cape Coral, FL 33904

Telephone: (941) 549-0555

11. Name: Norman F. Cho

Company: Castle Dental Laboratory

Address: 30 Hill, Suite B

Daly City, CA 94014

Telephone: (415) 991-4422

12. Name: Paul Letterman

Company: Ceramic Arts Dental Labs, Inc. Address: 7451 W. Oakland Park Blvd.

Lauderhill, FL 33319

Telephone: (305) 748-3800

13. Name: Sam Golman

Company: Dahlin Dental Lab

Address: 393 South Harlan, #210

Lakewood, CO 80226

Telephone: (303) 936-8241

14. Name: Dorrie

Company: Dahlin/Fernandez/Fritz

Address: Portland, OR

15. Name: Jim Bosheven

Company: Davis Labs

Address: Grand Rapids, MI 49548

Telephone: (616) 243-3311

16. Name: Cindy Harrell

Company: Dental Express, Inc. Address: 1640 Albritton Drive, #1

Kennesaw, GA

Telephone: (770) 499-1053

17. Name: Alice Sager

Company: Dental Laboratories, Inc. Address: 1099 Wilburn Road

Heber Springs, AR 72543

Telephone: (501) 362-3132

18. Name: Susan Reeves

Company: Dental Prosthetic Services

Address: P.O. Box 2939

Cedar Rapids, IA 52406

Telephone: (319) 393-1990

19. Name: George Obst (President and CEO)

Company: Dental Services Group

Address: 5500 Wayzata Blvd., Suite 920

Minneapolis, MN 55416-1262

Telephone: (612) 541-9622, ext. 1215

20. Name: Ron

Company: Denture Studio Address: Gresham, OR

21. Name: James McLees

Company: DiMartino Dental Lab, Inc.

Address: 345 Burnette N.

Renton, WA 98055

Telephone: (206) 228-5400

22. Name: John Higuera

Company: E & S Dental Lab Address: 1276 Morena Blvd.

San Diego, CA 92110

Telephone: (619) 281-7704

(619) 275-1339

23. Name: Gary

Company: Edgewood Dental Lab

Address: Mukiltec, WA

24. Company: Equipoise Dental Lab

Address: 85 Portland Ave.

Bergenfield, NJ 07621

Telephone: (201) 894-0867

25. Name: David Thomson

Company: Far West Dental Lab Address: 1660 North Main Street

Orange, CA 92667-3405

Telephone: (714) 998-8050

26. Name: Chris

Company: Functional Aesthetics Dental Laboratory

Address: 886 N. Mill Rd.

Lewisville, TX 75067

Telephone: (214) 221-7288

27. Name: Phil Watkins (Co-owner)

Company: Functional Aesthetics Dental Laboratory

Address: 886 N. Mill Rd.

Lewisville, TX 75067

Telephone: (214) 221-7288

28. Name: Randy McCrary

Company: Gibson Dental Designs

Address: Gainesville, GA

29. Name: Keith Allred (Director of Professional Services)

Company: Glidewell Laboratories Address: 4141 MacArthur Blvd.

Newport Beach, CA 92660

Telephone: (800) 411-9724

30. Name: Ron Fichter (Manager/Removables Department)

Company: Glidewell Laboratories Address: 4141 MacArthur Blvd.

Newport Beach, CA 92660

Telephone: (800) 411-9724

31. Name: Joe Baca (Department Manager)

Company: Gnathodontics Limited Address: 7105 W. 44th Avenue

Wheatridge, CO 80033

Telephone: (303) 424-9515

32. Name: Chuck Winston

Company: Great Southwest of Colorado

Address: Denver, CO 80207

33. Name: Josh Green (Owner)

Company: Green Dental Laboratories, Inc.

Address: 1099 Wilburn Road

Heber Springs, AR 72543

Telephone: (501) 362-3132

34. Name: Bruce

Company: Grossman Dental Lab

Address: San Diego, CA

35. Name: Mike Deloi

Company: Hermanson Dental Lab

Address: Minnesota Telephone: (612) 483-6611

36. Name: Don Harresen

Company: Heumann Lab Address: Topeka, KS Telephone: (913) 235-9293

37. Name: Bill Raven

Company: Heumann Lab Address: Topeka, KS Telephone: (913) 235-9293

38. Name: Jim Schroeder (General Manager)

Company: Heumann Lab Address: Topeka, KS Telephone: (913) 235-9293

39. Name: Chuck Coykendall

Company: Hopkins Dental Lab Address: 15 Tenth Avenue South

Hopkins, MN 55343

Telephone: (612) 938-3545

40. Name: Rand Jaslow

Company: Jaslow Dental Lab

Address: Pennsylvania Telephone: (800) 444-6886 41. Name: John Martino

Company: Keller Dental Lab

Address: 10966 Gravois Industrial

St. Louis, MO 64120

Telephone: (314) 842-4320

42. Name: Chey Miller

Company: Kless Kraft Dental Lab

Address: Nebraska

Telephone: (402) 391-8424

43. Name: Tom Willford

Company: Lab One Address: Norfolk, VA

44. Name: Ralph Langer

Company: Langer Dental Lab

Address: 10448 W. Garverdale Ct.

Boise, ID 83704

Telephone: (208) 377-2666

45. Company: Lantz Dental Lab

Address: Toledo, OH

46. Name: Karl Lass

Company: Lass Laboratory Address: 1109 M Street, NW

Washington, DC

Telephone: (202) 371-0330

(202) 683-5263

47. Name: Steve

Company: Lord's Dental Laboratory
Address: 501 Packerland Drive

P.O. Box 19048 (54307-9048)

Green Bay, WI 54307

Telephone: (414) 499-0411

48. Name: Reynolds Challoner (President and CEO)

Company: Lord's Dental Laboratory Address: 501 Packerland Drive

P.O. Box 19048 (54307-9048)

Green Bay, WI 54307

Telephone: (414) 499-0411

49. Name: Harold Sutherland

Company: Mid-State/Toler Dental Lab

Address: Jonesboro, AR

50. Name: Dr. Nakamura

Company: Dr. Nakamura Address: La Jolla, CA

51. Name: Jeff Napier

Company: Napier Dental Lab Address: Nicholasville, KY

52. Name: Dave Brown (Vice President, Treasurer, and Chief Financial Officer)

Company: National Dentex

Address: 111 Speen Street, Suite 520

Framingham, MA 01701

Telephone: (508) 820-4800

53. Name: Mandy

Company: O'Biren Dental Lab

Address: Corvallis, OR

54. Name: Bob Cook

Company: Oral Arts Dental Laboratory, Inc.

Address: 2353 Whiteburg Dr.

Huntsville, AL 35801

Telephone: (205) 533-6670

55. Name: Lynn McWorder

Company: Oral Arts Dental Laboratory, Inc.

Address: 2353 Whiteburg Dr.

Huntsville, AL 35801

Telephone: (205) 533-6670

56. Name: Danville T. Winstead (President)

Company: Oral Arts Dental Laboratory, Inc.

Address: 2353 Whiteburg Drive

Huntsville, AL 35801

Telephone: (205) 533-6670

57. Name: Raul Mercado (Owner and Technician)

Company: Oral Designs Address: Charlotte, NC Telephone: (704) 536-0235

58. Name: Mike Young

Company: Perry and Young Address: Aurora, CO

59. Name: Kathryn Haynes

Company: Pittman Dental Lab Address: Gainsville, GA

60. Name: Sandy Clark

Company: Precision Dental Lab

Address: 2400 Crown Point, Suite 200

Chalotte, NC

Telephone: (704) 845-2401

61. Name: Jerry

Company: Professional Dental Lab

Address: Sioux City, IA

62. Name: Bruce Keeling

Company: Progressive Prosthetics

Address: Scottsdale, AZ

63. Company: Recigno Dental Lab

Address: Pennsylvania Telephone: (215) 659-7755

64. Company: Roe Dental Lab

Address: 9565 Midwest Avenue

Garfield Heights, OH

Telephone: (216) 663-2233

65. Name: Frank Lloyd

Company: San Juan Dental Lab Address: 2105 Continental Pl.

Mount Vernon, WA 98273

Telephone: (206) 4247611

66. Name: Nancy Livingston

Company: Saylors Dental Laboratory, Inc.

Address: 8669 Phoenix Drive

P.O. Box 410

Manassas, VA 22110

Telephone: (703) 361-4176

67. Name: Dan Murphy (Supervisor)

Company: Saylors Dental Laboratory, Inc.

Address: 8669 Phoenix Drive

P.O. Box 410

Manassas, VA 22110

Telephone: (703) 361-4176

68. Name: Jeff Saylors

Company: Saylors Dental Laboratory, Inc.

Address: 8669 Phoenix Drive

P.O. Box 410

Manassas, VA 22110

Telephone: (703) 361-4176

69. Name: J. C. Scrimpshire

Company: Scrimpshire Dental Studio Inc.

Address: P.O. Box 1107

Huntsville, AL 35807

Telephone: (205) 533-5120

70. Company: Sherer Dental Lab

Address: 1145 Camden Avenue

Rock Hill, SC 29732

Telephone: (803) 328-0478

71. Name: John D. Hunt (Owner and President)

Company: Shortridge-Young Dental Laboratory

Address: 496 B Street

San Rafael, CA 94901

Telephone: (415) 454-0239

72. Name: Barbara Royal

> Company: Shortridge-Young Dental Laboratory

Address: 496 B Street

San Rafael, CA 94901

Telephone: (415) 454-0239

73. Name: Jeff Skold

> Skold Dental Lab Company: Address: Plymouth, MN Telephone: (612) 544-0911

74. Name: Garrett Smith (President)

> Company: **Smith Dental Prosthetics** Address: 2131 Art Museum Drive

> > Jacksonville, FL 32207

Telephone: (904) 398-6845

75. Name: Eloy Sepulveda

> Company: Stern Empire Dental Lab

P.O. Box 3308 Address:

Houston, TX 77253

(713) 688-3010 Telephone:

(817) 640-8341

76. Name: Hans Sonn

> Company: Sun Dental Lab Address: 612 Poipu Dr.

> > Honolulu, HI 96825

(808) 395-7677 Telephone:

77. Name: Susan

> Company: Thorn Ford Dental Lab

Address: Bothell, WA

78. Name: Jennifer

> Company: Treasure Dental Lab

Address: Idaho Falls, ID

79. Name: Leo Washburn

> Valley Prosthetics Company:

Address: Seattle, WA 80. Name: Connie

Company: Dr. Kevin Wallace
Address: 3518 South National

Springfield, MO 65807

Telephone: (417) 881-1123

81. Name: Wayne Welu

Company: Welu Dental Laboratory, Inc.

Address: 617 N 4th St

P.O. Box 830

Fargo, ND 58107

Telephone: (701) 235-7511

82. Name: Mr. Strohl

Company: Williams Dental Lab

Address: Erie, PA

83. Name: Jim Chandler

Company: Willow Creek Prosthodontic Lab

Address: 2205 Channing Way

Idaho Falls, ID 83404

Telephone: (208) 523-0495

84. Name: Fred

Company: Wornson-Polzin Dental Lab

Address: Mankato, MN

85. Name: David Zuckerman

Company: Zuckerman Dental Supply

Address: 437 Whittenton

Taunton, MA 02780-1392

Telephone: (508) 821-3787

(800) 323-3665

#### TRADE ASSOCIATIONS AND DENTAL SCHOOLS

1. Name: Nikolaj M. Petrovik (President and CEO)

Company: American Dental Trade Association (ADTA)

Address: 4222 King Street

Alexandria, VA 22302

Telephone: (703) 379-7755 Counsel: Jerry Jacobs Jenner & Block

601 Thirteenth Street, NW, Twelfth Floor

Washington, DC 20005

(202) 639-6000

2. Name: Darcie-Jo Godfrey (Executive Administrator)

Company: Dental Manufacturers of America, Inc.

Address: 123 South Broad Street

Fidelity Building, Suite 2030 Philadelphia, PA 19109-1020

Telephone: (215) 731-9975

(215) 731-9984

3. Name: Edwards Shils, PhD (Executive Director)

Company: Dental Manufacturers of America, Inc.

Address: 123 South Broad Street

Fidelity Building, Suite 2030 Philadelphia, PA 19109-1020

4. Name: Robert Stanley (Former Executive Director)

Company: National Association of Dental Labs

Address: 555 East Braddock Road

Alexandria, VA 22314-2106

Telephone: (703) 683-5263

5. Name: Dr. Steve Rosenstiel

Company: Ohio State University Dental School

Telephone: (614) 292-0941

6. Name: Dr. Markt

Company: Southern Illinois School of Dental Medicine

7. Name: Dr. Savoca

Company: Southern Illinois School of Dental Medicine

8. Name: Dr. Woerner

Company: Southern Illinois School of Dental Medicine

9. Name: Dr. John Bummer (Chairman of Removables)

Company: UCLA School of Dentistry

10. Name: Dr. Jay Gershen (Dean)

Company: UCLA School of Dentistry

Telephone: (310) 206-6063

11. Name: Dr. Ron Mito (Associate Dean of Clinical Dental Services)

Company: UCLA School of Dentistry

Telephone: (310) 794-7970

12. Name: Dr. Laura Newman (Associate Dean of Clinical Affairs)

Company: University of Illinois at Chicago Dental School

13. Name: Dr. Richard Perry (Professor)

Company: University of Illinois at Chicago Dental School

# FOREIGN GOVERNMENTAL ORGANIZATION

1. Name: Suzie Carpentier (Manager, Information Services)

Company: Canadian Government Statistics, International Trade Division

Address: Jean Talon Building

9th Floor

Ottawa, Ontario

K1A 0T6

Canada

Telephone: (613) 951-9647

(800) 294-5583

#### APPENDIX B

- B. Description of documents that may be relevant to disputed facts alleged with particularity in the pleadings.
  - 1. <u>Depositions</u>
- 1. Deposition of Steven Richard Desautel (Accu Bite Dental Supply; May 29, 1997).
- 2. Deposition of Betsy Harris (Atlanta Dental; Sept. 12, 1996).
- 3. Deposition of Jeffrey Libman (Darby Dental Lab Supply Company Inc.; June 10, 1997).
- 4. Deposition of Sidney Nordhauser (Darby Dental Lab Supply Company Inc.; Aug. 29, 1996).
- 5. Deposition of Regis G. Vetrano (Dental Laboratory Discount Supply; July 24, 1996).
- 6. Deposition of Robert Raths (Former President of Dental Technicians Supply; Nov. 6, 1996).
- 7. Deposition of Thomas Cavanagh (Frink Dental; Aug. 22, 1996).
- 8. Deposition of Morton Spatz (Lincoln Dental; Nov. 14, 1996).
- 9. Deposition of James Wiltz (Patterson Dental Company; Sept. 5, 1996).
- 10. Deposition of Keyhan Kashfian (Pearson Dental Supply, Inc.; Aug. 5, 1996).
- 11. Deposition of Kevin Ackeret (Sullivan Dental; Sept. 6, 1996).
- 12. Deposition of Maurice Mazz (Zahn Dental Co., Inc.; Aug. 28, 1996).
- 13. Deposition of Norman Weinstock (Zahn Dental Company, Inc; July 23, 1996).
  - 2. <u>Documents and/or Interrogatory Responses Provided by the Following Entities</u>
- 1. American Tooth Industries/Justi
- 2. Austenal Corporation/Myerson-Kenson

- 3. Canadian Government Statistics, International Trade Division
- 4. Darby Dental Lab Supply Company Inc.
- 5. Dental Laboratory Discount Supply/H.L. Hayden Company
- 6. Dental Manufacturers of America, Inc.
- 7. Dental Technicians Supply
- 8. Dentorium Products Company, Inc.
- 9. Far West Dental Supply
- 10. Frink Dental
- 11. Henry L. Schein Co.
- 12. Heraeus Kulzer, Inc.
- 13. Ivoclar North America, Inc.
- 14. Lincoln Dental
- 15. National Association of Dental Labs
- 16. Ott Dental Supply
- 17. Patterson Dental Company
- 18. Pearson Dental Supply Inc.
- 19. Reeve Dental
- 20. Technical Dental Supplies
- 21. Universal Dental Division of the Lactona Corporation
- 22. Vident
- 23. Zahn Dental Company, Inc.
- 24. 3M

# 3. <u>Miscellaneous</u>

- 1. <u>Antitrust Compliance Program</u> by Dentsply International
- 2. Internal work product of the U.S. Department of Justice
- 3. Materials relating to experts retained or consulted with by the U.S. Department of Justice
- 4. News clippings
- 5. Promotional brochures
- 6. Teeth, color guides, video tapes and CD-ROMS