

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) SUPPLEMENTAL INITIAL DISCLOSURES

Pursuant to Fed. R. Civ. P. 26(e)(1), plaintiff the United States of America hereby serves these Supplemental Initial Disclosures to Defendant. Plaintiff has discovered documents from three entities, not listed in Appendix B to the Plaintiff’s Initial Disclosures, that were provided to the Antitrust Division, prior to the filing of those Initial Disclosures. These documents may be relevant to disputed facts alleged with particularity in the pleadings. In addition, the Plaintiff has discovered that the telephone number that it provided for Dentorium in its Appendix A was, in fact, a fax number. Consequently, Plaintiff is serving this Supplemental Initial Disclosures that lists, in Supplemental Appendix A, the correct telephone number for Dentorium and lists, in Supplemental Appendix B, the three additional entities.

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

COUNSEL FOR PLAINTIFF
UNITED STATES OF AMERICA

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DATED: March 5, 1999

SUPPLEMENTAL APPENDIX A

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

DEALERS

23. Name: Lenny Heller (Domestic Manager)
Company: Dentorium Products Company, Inc.
Address: 18 West 21st Street
New York, NY 10010
Telephone: (212) 691-6464
Counsel: Nathan Newman (Vice President and General Counsel)
18 West 21st Street
New York, NY 10010
(212) 691-6464
24. Name: George Martin (President)
Company: Dentorium Products Company, Inc.
Address: 18 West 21st Street
New York, NY 10010
Telephone: (212) 691-6464
Counsel: Nathan Newman (Vice President and General Counsel)
18 West 21st Street
New York, NY 10010
(212) 691-6464

SUPPLEMENTAL APPENDIX B

B. Description of documents that may be relevant to disputed facts alleged with particularity in the pleadings.

2. Documents and/or Interrogatory Responses Provided by the Following Entities

1. American Dental Trade Association
2. Lord's Dental Laboratory
3. Trinity Dental Products, Inc.