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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

GOLDEN GATE PHARMACY SERVICES, INC., d/b/a GOLDEN GATE PHARMACY, JAMES CLAYWORTH, R.Ph., MARIN APOTHECARIES, d/b/a ROSS VALLEY PHARMACY, PEDIATRIC CARE PHARMACY, INC., TONY MAVRANTONIS, R.Ph., JOHN O'CONNELL, R. Ph, and TILLEY APOTHECARIES, INC., d/b/a ZWEBER'S APOTHECARY, Plaintiffs, v. PFIZER, INC., WYETH Defendants.	**Case No.CV-09-3854-MMC** **FIRST AMENDED COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF FOR VIOLATION OF UNITED STATES ANTITRUST LAWS** **JURY TRIAL DEMANDED**

Plaintiffs, above named, retail pharmacies in California who purchase drugs directly or indirectly from the defendants, bring this action under Sections 4 and 16 of the Clayton Antitrust Act, 15 U.S.C. Sections 15, 26, for damages and for divestiture and to enjoin violations of Section 1 of the Sherman Act, 15 U.S.C. Section 1, and Section 7 of the Clayton Act, 15 U.S.C. Section 18, arising from the merger of the defendants above named; demand trial by jury of all issues triable thereby; and for their Complaint allege as follows:

INTRODUCTION

1. In January 26, 2009, the defendants above named announced that they had agreed to combine in a cash-and-stock deal for $68 billion dollars, merging Pfizer, Inc. ("Pfizer"), the lartgest pharmaceutical manufacturer in the world, and Wyeth, the fourth largest pharmaceutical manufacturer in the United States, to create the largest big pharma and largest biopharma merger in world history. Four of the five financial institutions providing the $22.5 billion loan to facilitate the merger are recipients of major capital infusions under U.S. Treasury Department's TARP funds. Specifically, Bank of America and Citigroup have received a combined $85 billion in TARP funds, and the other two banks, Goldman Sachs and JP Morgan Chase, have received a combined $35 billion, for a total of $120 billion in government funds. On October 15, 2009, pursuant to their announcement, the defendants closed and consummated their merger.

2. The effect of the announced merger of defendants may be to lessen competition or to tend to create a monopoly, and has already lessened competition and tended to create a monopoly, in numerous markets and submarkets identified hereafter involving the manufacture and sale of pharmaceuticals and involving research, development, and innovation with respect to pharmaceuticals.

3. Plaintiffs are pharmacies who have purchased drugs from one or both of the defendants in the past, and expect to continue to do so in the future. They are threatened with loss or damage by defendants' merger in violation of Section 7 of the Clayton Act and Section 1 of the Sherman Act in the form of higher drug prices, reduced consumer choice, and diminished quality, and, accordingly, they bring this action for damages, preliminary injunctive relief, and divestiture and permanent injunctive relief against the merger pursuant to Section 16 of the Clayton Act, 15 U.S.C. Section 26.

4. The preliminary injunctive relief plaintiffs seek and will promptly move the Court to award is a temporary restraining order, followed by a preliminary injunction, requiring during the pendency of this action, (1) that defendants hold separate and not commingle their two businesses that have been combined pursuant to their merger, so that divestiture may be expeditiously and effectively accomplished following trial on the merits and judgment in

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plaintiffs' favor; (2) that persons engaged in the pricing of products at Pfizer and Wyeth prior to their merger be enjoined from communicating with each about prices during the pendency of this action; (3) that persons engaged in the marketing of products at Pfizer and Wyeth prior to their merger be enjoined from communicating with each about marketing during the pendency of this action; and (4) that defendants and their merged company be enjoined from firing, discharging, laying off, or otherwise curtailing the employment of any person as a result of the defendants' merger, including, but not limited to, persons occupying the approximately 20,000 positions defendants have previously announced they plan to eliminate pursuant to their merger.

JURISDICTION

5. This action is brought under Sections 4 and 16 of the Clayton Act, 15 U.S.C. Sections 15, 26, to secure damages and equitable relief against the defendants by reason of their violations of Section 7 of the Clayton Antitrust Act, 15 U.S.C. Section 18, and Section 1 of the Sherman Act, 15 U.S.C. Section 1. This Court has subject matter jurisdiction of the federal antitrust claims asserted in this action under Sections 4 and 16 of the Clayton Antitrust Act, 15 U.S.C. Sections 15, 26, and Title 28 United States Code Sections 1331 and 1337.

THE PARTIES

6. Each of the plaintiffs named in this Complaint has purchased drugs, directly or indirectly, from one or both of the defendants and each plaintiff expects to continue to purchase drugs from one or both of the defendants or their merged entity in the future.

7. Plaintiff Golden Gate Pharmacy Services, Inc. d/b/a Golden Gate Pharmacy is a California corporation managed by Rebecca Lofholm, R.Ph, with its principal place of business at 2165 E. Francisco Boulevard, Suite A-2, San Rafael, California

8 Plaintiff James Clayworth, R.Ph., is a resident doing business as Clayworth Pharmacy and Clayworth Healthcare, 20353 Lake Chabot Road, Suite 101, Castro Valley, California 94546.

9. Plaintiff Marin Apothecaries, Inc. d/b/a/ Ross Valley Pharmacy, is a California corporation managed by Paul Lofholm, R.Ph, with its principal place of business at 2 Bon Air Road, Larkspur, California 94939.

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. 10. Plaintiff Pediatric Care Pharmacy, Inc. is a California corporation, managed by Tom Liautaud, R.Ph., with its principal place of business at 4616 Delongpre Avenue, Los Angeles, California 90027.

. 11. Plaintiff Tony Mavrantonis, R. Ph. is a California resident doing business as Jack's Drug, 121 Tunstead, San Anselmo, California 94960.

12. Plaintiff John O'Connell, R. Ph, is a California resident who has purchased drugs, directly or indirectly from one or both of the defendants and expects to continue to purchase drugs from one or both of the defendants or their merged entity in the future.

13. Plaintiff Tilley Apothecaries, Inc. d/b/a Zweber's Apothecary is a California corporation, managed by John Tilley, R.Ph, with its principal place of business at 11411 Brookshire Ave, Downey, California 90241.

14. Defendant Pfizer is a Delaware corporation with its principal place of business at 235 East 42nd Street, New York, New York 10017. Pfizer is the world's largest drug maker.

15. Pfizer is engaged in, *inter alia*, the research, development, manufacture, distribution, and sale of human pharmaceutical products, as well as animal health products through its Pfizer Animal Health division.

16. Defendant Wyeth, formerly known as American Home Products Corporation, is a Delaware corporation with its principal place of business at 5 Giralda Farms, Madison, New Jersey 07940.

17. Wyeth is engaged in, *inter alia*, the research, development, manufacture, distribution, and sale of human pharmaceutical products, as well as animal health products through its Fort Dodge Animal Health ("Fort Dodge") division.

NATURE OF TRADE AND COMMERCE

16. The relevant geographic market for purposes of this action is the United States.

17. For the purposes of this action, the relevant product markets in which to analyze the effects of the defendants merger include:

a. The manufacture and sale of all prescription pharmaceutical products.

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b. The manufacture and sale of all brand name prescrition pharmaceutical products.

c. The innovation market for the research and development of new prescription pharmaceutical products.

d. The innovation market for the research and development of new brand name prescrition pharmaceutical products.

e. The innovation market for the research and development of new drugs for the treatment of osteoporosis.

f. The manufacture and sale of drugs for the treatment for the treatment of Alzheimer's disease.

g. The innovation market for the research and development of new drugs for the treatment of Alzheimer's disease.

h. The manufacture and sale of drugs for the treatment of renal cell carcinoma.

i. The manufacture and sale of drugs for the treatment of Methicillin-resistant Staphylococcus aureus ("MRSA") infections.

j. The manufacture and sale of brand name antidepressants.

k. The manufacture and sale of brand name prescription anti-bacterials.

l. The manufacture and sale of brand name prescription anti-neoplastics.

m. The manufacture and sale of numerous animal health products, including each product named in paragraphs 7a through 7u of the Complaint in In the Matter of Pfizer, Inc., before the Federal Trade Commission, Docket No. C-4267, dated October 14, 2009, of which a true and correct copy is attached hereto and included herein as Exhibit A.

18. The markets set forth in paragraph 17, supra, are all well recognized in financial and economic literature and in the law. The overall pharmaceutical market is recognized by Fortune Magazine. The prescription drug market recognized is by Dun & Bradstreet. The brand name prescription drug market is recognized by IMS Health (NYSE: RX), the world's leading provider of market intelligence to the pharmaceutical and healthcare industries.. In all of these

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defined markets, Pfizer and Wyeth rank in the top five. In the prescription drug market, they are first and second. Brand name prescription drugs is a well recognized product market similar to shoes, banking, and groceries. As the Supreme Court has pointed out, industry or public recognition of a market is an important indicator of relevant market. In its annual rankings of the top pharmaceutical companies in the United States, Fortune Magazine, May 5, 2008, ranked Pfizer and Wyeth as numbers two and three in the industry. The leading trade association in the industry, Pharmaceutical Research and Manufacturing Association (PhARMA), restricts its membership to brand name prescription drug innovators, manufacturers, and sellers. Through this association, the CEO's of defendants and other members of the market meet at least once a month to discuss industry problems, prices, products, and research. Brand name prescription drugs are also marketed differently from other products. Because only licensed doctors can write prescriptions, which are necessary to purchase defendants' products, the industry marketing is particularly focused on the doctors and the hospitals where doctors congregate. In this marketing, the defendants advertise extensively in medical journals, such as the Journal of The American Medical Association, that are tailored to the doctor. In addition, detail men visit the individual doctors and hospitals to provide free literature, product, promotions and gratuities. In all of this marketing, the defendants focus on their ability to offer a broad range of pharmaceutical products for a wide variety of illnesses and ailments.

19. Pfizer and Wyeth are substantial rivals, actual or potential, in each and all of the relevant markets set forth in paragraph 17. The behavior of each is therefore constrained by actual and potential competition from the other throughout each and all of the relevant markets.

20. Each of the markets listed in paragraph 17 exists in interstate commerce, makes extensive use of the instrumentalities of interstate commerce, and substantially affects interstate commerce. Materials used in the manufacture of each of the products listed in paragraph 17 are purchased in a continuous and uninterrupted flow of interstate commerce.

21. Any restraint of trade in any of the relevant markets listed in paragraph 17, including the restraints specifically alleged in this Complaint, directly and substantially restrains and affects interstate commerce in the United States.

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ANTICOMPETITIVE EFFECTS OF DEFENDANTS' MERGER IN THE RELEVANT MARKETS

22. The past fifteen years have included increasing concentration in the relevant markets with at least 15 mergers and acquisitions of competitors, among them two by Pfizer and one by Wyeth. The mergers and acquisitions include the following: (1) Roche Holding ltd and Genentech, Inc.; (2) AstraZeneca PLC and Medimmune, Inc.; (3) Merck KGgA and Serono SA; (4) Bayer AG and Schering AG; (5) Novartis AG and Chiron Corporation; (6) Sanofi-Synthelabo and Aventis; (7) Pfizer, Inc. and Pharmacia Corporation; (8) Johnson & Johnson and ALZA Corporation; (9) Glaxo Wellcome pic and SmithKline Beecham pic; (10) Pfizer and Warner-Lambert Company; (11) Zeneca Group plc and Astra AB; (12) Sanofi SA and Synthelabo SA; (13) Sandoz AG and Ciba-Geigy AG; (14) Glaxo plc and Wellcome plc; and (15) Wyeth and American Cyanamid Company. The defendants' merger will not only continue this trend, but will encourage others to merger out of a professed concern to be able to compete with the defendants' merged company.

23. The innovation markets set forth in paragraph 17 consist of the research and development directed towards particular new or improved goods or process, and the close substitutes for that research and development. In 2008 Pfizer spent $7.9 billion on research and development, while Wyeth spent $3.4 billion on research and development in the same year. At the same time, the industry spent $38.4 billion on research and development, according to the PhARMA Annual Membership Survey, 2009. Thus the defendants accounted for $11.3 billion of the $38.4 billion or over 25 per cent of industry research and development spending in the United States. According to one study reported in Business Week, Drug Mergers are Killers of Research. "These mergers tend to have a negative effect on R&D culture in general." The merger of defendants will end competition between them in all of the innovation markets set forth in paragraph 17. Because of defendants' size, and their combined power once they have merged, other actual and potential competitors will be deterred from competing with defendants in these innovation markets, with consequent harm both to competition and to consumers.

24. In the market for brand name prescription antidepressants, Pfizer and Wyeth have competing products. Wyeth's Effexor XR and Effexor compete with Pfizer's Zoloft. This is an $11.2 billion market (IMS), in which Pfizer's dominance will intensify through the merger. After the merger, Pfizer and Wyeth will no longer compete in this market, competition will be limited, and the likely result will be higher prices for all drugs sold in this market. The merged company will have a dominant position in the market, with the ability to raise prices, create a price umbrella, and deter competition from smaller rivals. Because of defendants' size, and their combined power once they have merged, other actual and potential competitors will be deterred from competing with defendants in the brand name antidepressant market, with consequent harm both to competition and to consumers.

25. In the market for brand name prescription anti-bacterials Wyeth's Tygacil competes with Pfizer's Zyvox. After the merger, Pfizer and Wyeth will no longer compete in this market, competition will be limited, and the likely result will be higher prices for all drugs sold in this market. The merged company will have a dominant position in the market, with the ability to raise prices, create a price umbrella, and deter competition from smaller rivals. Because of defendants' size, and their combined power once they have merged, other actual and potential competitors will be deterred from competing with defendants in the brand name prescription anti-bacterials market, with consequent harm both to competition and to consumers.

26. In the market for brand name prescription anti-neoplastics Wyeth's Torisel competes with Pfizers Sutent. After the merger, Pfizer and Wyeth will no longer compete in this market, competition will be limited, and the likely result will be higher prices set for all drugs sold in this market. The merged company will have a dominant position in the market, with the ability to raise prices, create a price umbrella, and deter competition from smaller rivals. Because of defendants' size, and their combined power once they have merged, other actual and potential competitors will be deterred from competing with defendants in the brand name prescription anti-neoplastics market, with consequent harm both to competition and to consumers.

27. In the market for brand name prescription drugs for the treatment of renal-cell carcinoma, Pfizer and Wyeth have products that are competitive. After the merger, Pfizer and

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Wyeth will no longer compete in this market, competition will be limited, and the likely result will be higher prices set for all drugs sold in this market. The merged company will have a dominant position in the market, with the ability to raise prices, create a price umbrella, and deter competition from smaller rivals. Because of defendants' size, and their combined power once they have merged, other actual and potential competitors will be deterred from competing with defendants in the market for brand name prescription drugs for the treatment of renal-cell carcinoma, with consequent harm both to competition and to consumers.

28. In the market for brand name prescription drugs for the treatment of MRSA infections Pfizer and Wyeth have products that are competitive. After the merger, Pfizer and Wyeth will no longer compete in this market, competition will be limited, and the likely result will be higher prices set for all drugs sold in this market. The merged company will have a dominant position in the market, with the ability to raise prices, create a price umbrella, and deter competition from smaller rivals. Because of defendants' size, and their combined power once they have merged, other actual and potential competitors will be deterred from competing with defendants in the market for brand name prescription drugs for the treatment of MRSA infections with consequent harm both to competition and to consumers.

29. In the innovation market for the development of prescription drugs for the treatment of osteoporosis, Pfizer and Wyeth are developing products that are competitive. After the merger, Pfizer and Wyeth will no longer compete in this market, competition will be limited, and the likely result will be higher prices set for all drugs sold in this market. The merged company will have a dominant position in the market, with the ability to raise prices, create a price umbrella, and deter competition from smaller rivals once a product has been developed. Because of defendants' size, and their combined power once they have merged, other actual and potential competitors will be deterred from competing with defendants in the innovation market for the development of brand name prescription drugs for the treatment of osteoporosis with consequent harm both to competition and to consumers.

30. In the innovation market for the development of brand name prescription drugs for the treatment of Alzheimer's disease, Pfizer already markets Aricept, and both Pfizer and Wyeth are developing products that are competitive. After the merger, Pfizer and Wyeth will no longer compete in this market, competition will be limited, and the likely result will be higher prices set for all drugs sold in this market. The merged company will have a dominant position in the market, with the ability to raise prices, create a price umbrella, and deter competition from smaller rivals once a product has been developed. Because of defendants' size, and their combined power once they have merged, other actual and potential competitors will be deterred from competing with defendants in the innovation market for the development of brand name prescription drugs for the treatment of Alzheimer's drugs with consequent harm both to competition and to consumers.

31. With respect to each of the numerous animal health products, including each product named in paragraphs 7a through 7u of the Complaint in In the Matter of Pfizer, Inc., before the Federal Trade Commission, Docket No. C-4267, dated October 14, 2009, the market is highly concentrated, the defendants already have a dominant position and market share, in many cases being the only two suppliers, and their merger would create a monopoly or otherwise unreasonably and unduly restrict competition, all as more fully alleged in paragraphs 9 through 28 of the FTC Complaint, attached as Exhibit A hereto. Although defendants have agreed with the FTC to divestitures with respect to these animal health product markets, the divestitures have not occurred, and will not be sufficient to preserve or restore competition in these markets, even if they do in fact eventuate.

32. There are significant barriers to entry in each of the relevant markets, as well as a history of a lack of successful new entry. According to Tufts Center for the Study of Drug Developments, the average cost of developing a new prescription drug is $897 million dollars. New entry into the relevant markets cannot be timely, likely, or sufficient to deter or counteract the anticompetitive effects of the defendants' merger. New entry into the relevant markets is a difficult process because of, among other things, the time and cost associated with researching and developing the products, obtaining approval to market the products from

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the United States Food and Drug Administration in the case of pharmaceutical products, or the United States Department of Agriculture in the case of biological products, and gaining customer acceptance. As a result, new entry into any of these markets sufficient to achieve a significant market impact within at least two years is unlikely.

33. Expansion by smaller competitors into the relevant markets would also not be timely, likely, or sufficient to deter or counteract the the anticompetitive effects of the defendants merger for the reasons set forth in paragraph 32.

34. The anticompetitive effects of the defendants' merger in each of the relevant markets set forth in paragraph 17 will include (a) the elimination of actual, direct, and substantial competition between defendants for the sale or development of each of the relevant products in the United States; (b) an increase in the likelihood that the merged entity will exercise market power unilaterally in the United States market for each of the relevant products; (c) an increase in the likelihood and degree of coordinated interaction between or amonf suppliers in the United States markets for each of the relevant products; (d) a decrease in the merged entity's incentives to pursue further innovation in the United States market for each of the relevant products; and (e) an increase in the likelihood that United States customers will be forced to pay higher prices for each of the relevant products.

35. By reason of defendants' merger, the plaintiffs are threatened with loss or damage in the form of higher drug prices, reduced choice, and lower quality.

VIOLATIONS

CLAYTON ACT, SECTION 7

37. The conduct of Defendants described hereinabove, specifically their merger, constitutes a violation of Section 7 of the Clayton Act, 15 U.S.C. Section 18, in that the effect of the proposed merger of defendants may be substantially to lessen competition, or to tend to create a monopoly in the relevant markets alleged herein, by reason of which violation the plaintiffs are threatened with loss or damage in the form of higher prices, such that plaintiffs are entitled to bring suit under Sections 4 and 16 of the Clayton Antitrust Act, 15 U.S.C. Sections 15, 26, for (1) an order of divestiture requiring the defendants to unwind their merger; (2) a temporary

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restraining order and preliminary injunction requiring during the pendency of this action, (a) that defendants hold separate and not commingle their two businesses that have been combined pursuant to their merger, so that divestiture may be expeditiously and effectively accomplished following trial on the merits and judgment in plaintiffs' favor; (b) that persons engaged in the pricing of products at Pfizer and Wyeth prior to their merger be enjoined from communicating with each about prices during the pendency of this action; (c) that persons engaged in the marketing of products at Pfizer and Wyeth prior to their merger be enjoined from communicating with each about marketing during the pendency of this action; and (d) that defendants and their merged company be enjoined from firing, discharging, laying off, or otherwise curtailing the employment of any person as a result of the defendants' merger, including, but not limited to, persons occupying the approximately 20,000 positions defendants have previously announced they plan to eliminate pursuant to their merger; (3) judgment for such damages as plaintiffs show themselves to have sustained prior to a final judgment of divestiture; and (4) plaintiffs' cost of suit, including a reasonable attorney's fee.

SHERMAN ACT, SECTION 1

38. The conduct of Defendants described hereinabove, specifically their merger, constitutes a violation of Section 1 of the Sherman Act, 15 U.S.C. Section 1, in that defendants' merger and agreement to merge constitute an agreement and combination that unreasonably restrains trade in the relevant markets alleged herein, by reason of which violation the plaintiffs are threatened with loss or damage in the form of higher prices, such that plaintiffs are entitled to bring suit under Sections 4 and 16 of the Clayton Antitrust Act, 15 U.S.C. Sections 15, 26, for (1) an order of divestiture requiring the defendants to unwind their merger; (2) a temporary restraining order and preliminary injunction requiring during the pendency of this action, (a) that defendants hold separate and not commingle their two businesses that have been combined pursuant to their merger, so that divestiture may be expeditiously and effectively accomplished following trial on the merits and judgment in plaintiffs' favor; (b) that persons engaged in the pricing of products at Pfizer and Wyeth prior to their merger be enjoined from communicating with each about prices during the pendency of this action; (c) that persons engaged in the

marketing of products at Pfizer and Wyeth prior to their merger be enjoined from communicating with each about marketing during the pendency of this action; and (d) that defendants and their merged company be enjoined from firing, discharging, laying off, or otherwise curtailing the employment of any person as a result of the defendants' merger, including, but not limited to, persons occupying the approximately 20,000 positions defendants have previously announced they plan to eliminate pursuant to their merger; (3) judgment for such damages as plaintiffs show themselves to have sustained prior to a final judgment of divestiture; and (4) plaintiffs' cost of suit, including a reasonable attorney's fee.

PRAYER FOR RELIEF

WHEREFORE, plaintiffs demand the following from this Honorable Court:

A. Declaring, finding, adjudging and decreeing that the merger and agreement of the defendants to merge violate Section 7 of the Clayton Antitrust Act, Section 18, and Section 1 of the Sherman Act, 15 U.S.C. Section 1.

B. A final judgment of divestiture requiring defendants to unwind their merger and permanently enjoining them from merging in the future.

C. A temporary restraining order and preliminary injunction requiring during the pendency of this action, (a) that defendants hold separate and not commingle their two businesses that have been combined pursuant to their merger, so that divestiture may be expeditiously and effectively accomplished following trial on the merits and judgment in plaintiffs' favor; (b) that persons engaged in the pricing of products at Pfizer and Wyeth prior to their merger be enjoined from communicating with each about prices during the pendency of this action; (c) that persons engaged in the marketing of products at Pfizer and Wyeth prior to their merger be enjoined from communicating with each about marketing during the pendency of this action; and (d) that defendants and their merged company be enjoined from firing, discharging, laying off, or otherwise curtailing the employment of any person as a result of the defendants' merger, including, but not limited to, persons occupying the

approximately 20,000 positions defendants have previously announced they plan to eliminate pursuant to their merger.

D. Judgment awarding plaintiffs such damages, trebled, as they show themselves to have sustained during the pendency of defendants' merger prior to an order of divestiture.

E. Awarding to plaintiffs their costs of suit, including a reasonable attorney's fee, as provided by Sections 4 and 16 of the Clayton Antitrust Act, 15 U.S. C. Sections 15, 26;

F. Granting plaintiffs such other and further relief to which they may be entitled and which the Court finds to be just and appropriate.

DATED: October 16, 2009.

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