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SEP 10 2007

September 7, 2007

**VIA FED EX – Overnight and Facsimile (907) 274-9493**

Mr. James B. Gottstein, Esq.  
406 G. Street, Suite 206  
Anchorage, Alaska 99501

RE: **In the Matter of Nexesity for the Hospitalization of William S. Bigley  
v. William Worrall, MD**

Case No.: **3AN 07-1064 P/S**

Dear Mr. Gottstein,

Abbott Laboratories received your subpoena in the above-referenced matter on September 6, 2007. We have reviewed the subpoena and object on the following grounds.

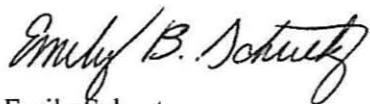
First, your subpoena asked Abbott to produce documents by September 5, 2007, something Abbott could not do because it did not even receive your subpoena until September 6, 2007.

Second, Abbott objects to your subpoena as terribly overbroad and calling for information not likely to lead to discoverable evidence in the above-referenced matter. Abbott has literally hundreds of boxes of materials relating to Depakote that you might believe fall within the scope of your subpoena. For Abbott to produce all of these materials to you, especially on such short notice, would impose a heavy administrative and financial burden. Moreover, as Abbott is a third-party to this matter, we would require that you pay the cost for Abbott to copy any materials you wish Abbott to produce.

While Abbott makes these specific objections and reserves its rights to make any and all other objections to your subpoena, as I stated in my voicemail to you this morning, Abbott is willing to work with you to narrow the scope of your request so that Abbott might be able to provide to you the documents you really need for this matter.

Please contact me at the above-referenced number so that we can discuss how to best proceed in this matter.

Sincerely,



Emily Schuetz  
Commercial Litigation Paralegal

From: Origin ID: FEPA (847)937-5267  
Christina Crum  
Abbott  
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Abbott Park, IL 60064



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**James Gottstein**

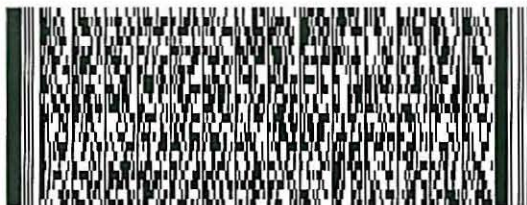
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406 G. Street  
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Ref # William S Bigley  
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