

EXHIBIT A

Christopher Stomberg, Ph.D.

Principal

Summary of experience

Christopher Stomberg, Ph.D. has more than 15 years of experience in commercial antitrust litigation, econometric modeling, and quantitative economic analysis. He specializes in the pharmaceutical and healthcare industries, and also has extensive experience in the agriculture, asbestos, chemicals, computer, security, and telecommunication industries. Dr. Stomberg has assisted in developing several of the custom analytical tools and techniques employed at Bates White, specifically those dealing with the application of statistical and analytical techniques to antitrust and litigation matters.

Areas of expertise

- Pharmaceutical and healthcare litigation
- Price-fixing analysis
- Merger analysis
- Damage estimation
- Pharmaceutical marketing portfolio optimization
- Econometrics and statistical analysis including artificial neural networks

Selected experience

- Supporting expert work of Eric M. Gaier, Ph.D. of Bates White on behalf of defendants in the ongoing *State of Nevada v. American Home Products Corp., et al* and *State of Montana v. Abbott Labs., Inc., et al.* matters involving allegations of Average Wholesale Price fraud affecting Medicaid, other state programs, and consumers in the states of Nevada and Montana.
- Supporting the expert testifying work of Eric M. Gaier, Ph.D. of Bates White on behalf of joint defense group in the ongoing *In re Pharmaceutical Industry Average Wholesale Price Litigation*, involving allegations of Average Wholesale Price fraud affecting a proposed nationwide class of consumers and third-party payers. Responsibilities have included the

preparation of expert reports on behalf of defendants regarding class certification and merits, and preparation for deposition. Responsibilities also include advising counsel regarding discovery, reviewing discovery material, providing ongoing economic analysis, and preparing material for fact and expert witness depositions.

- Supporting the expert work of Eric M. Gaier, Ph.D. of Bates White on behalf of defendant Abbott Labs in the matter of *State of West Virginia v. Warrick Pharmaceutical Corporation, Schering Plough Corporation, Dey, Inc., Abbott Laboratories, and Abbott Laboratories, Inc.* involving allegations of Average Wholesale Price fraud affecting Medicaid and other state programs in West Virginia.
- Delivered a presentation, “Will Medicaid eliminate authorized generics?” at the June 2006 Law Seminars International conference: “Maximizing pharmaceutical patent lifecycles.” This presentation explores the effects of forthcoming changes to Medicaid best-price rebate provisions on the profitability of authorized generic drugs.
- Supported the expert work of Halbert M. White, Ph.D., of Bates White resulting in an affidavit in support of Daubert motions filed in the *In re Pharmaceutical Industry Average Wholesale Price Litigation*.
- Supported the expert work of Eric M. Gaier, Ph.D. of Bates White on behalf of defendants in the matter of *Robert J. Swanston v. TAP Pharmaceutical Products Inc., et al.*, involving allegations of Average Wholesale Price fraud affecting plaintiffs in Arizona.
- Directed statistical and economic teams supporting the expert testimony of Halbert L. White, Ph.D. of Bates White, on behalf of the Federal Trade Commission in a merger investigation involving two large bricks-and-mortar store chains. This merger was not consummated.
- Implemented economic and statistical analysis of damages in support of Dr. B. Douglas Bernheim of Stanford University for his work on behalf of class plaintiffs and a group of 140 opt-out plaintiffs in the *In re Vitamins Antitrust Litigation*.
- Managed all analytical, expert, and litigation support work for Jeffrey M. Perloff, Ph.D. of the University of California, Berkeley, in his expert testimony on behalf of an individual opt-out plaintiff (leading breakfast cereal manufacturer) in the *In re Vitamins Antitrust Litigation*.
- Managed NIH-funded SBIR research project for the development of a non-invasive atherosclerosis diagnostic tool using magnetic resonance imaging (MRI). This work successfully validated the concept and Dr. Halbert White’s artificial neural network

software for this application. Next-stage funding is being pursued. Poster session presented at 2004 Pharmaceutical Management Science Association (PMSA) meetings.

- Co-authored (with Pauline Kennedy, Ph.D.) an internal working paper on the application of statistical cross-validation techniques to aid proper model selection in merger price-effects studies. This paper was presented at the annual Bates White Antitrust Workshop.
- Managed self-funded project to update the widely cited Wilson-D'Agostino study of coronary heart disease prediction. Used artificial neural network tools developed by Dr. Halbert White to demonstrate measurable improvements over current prediction methods.
- Authored a study, "Promotional Response Modeling: Combining Structural and Statistical Approaches," which was presented at the 2004 Pharmaceutical Management Science Association (PMSA) Conference. This study (co-authored by Halbert L. White, Ph.D.) describes strategic pharmaceutical marketing simulation and portfolio optimization tools that were developed using cutting-edge econometric forecasting and simulation techniques.
- Led the development of an innovative tactical product sampling optimization tool for a top-tier client in the pharmaceuticals industry. Artificial neural network technology was used to accurately identify target physicians for the client's sales force.
- Developed appropriate damage estimation and data validation techniques on behalf of a FORTUNE 500 defendant involved in a price-fixing matter.

Professional experience

Prior to joining Bates White, Dr. Stomberg served as an independent market research consultant, and he was the Chief Statistician in the Custom Solutions Group at Computer Intelligence in La Jolla, California. In these roles, Dr. Stomberg led the design, execution, and presentation of analytical solutions for a large number of high-profile, B2B market research projects on behalf of many FORTUNE 100 companies. Dr. Stomberg has also consulted for USAID and the World Bank.

Education

- Ph.D., Economics, University of California, San Diego
- M.A., Economics, The George Washington University

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- B.A., Economics, University of Massachusetts, Amherst (*cum laude*)
- Study Abroad, Scandinavian Seminar, Sweden

Publications

- Stomberg, Christopher, and others. “Automated Classification of Atherosclerotic Plaque from MR Images Using Predictive Models” (submitted to *Magnetic Resonance in Medicine*).
- Stomberg, Christopher. “Specification Testing with Information Matrix Equalities.” Ph.D. diss., University of California, San Diego, 2000.
- Stomberg, Christopher, and Halbert L. White. “Bootstrapping the Information Matrix Test.” Department of Economics Working Paper 2000–04, University of California, San Diego, April 2000.
- Stomberg, Christopher. “Annual Review of Evaluation Results.” World Bank, Washington, DC, 1991 and 1992.
- Stomberg, Christopher. “Performance Indicators for Selected Water and Sanitation Utilities in Ecuador.” Water and Sanitation for Health Project, Arlington, VA, November 1992.
- Stomberg, Christopher. “Macroeconomic Limits to Coverage.” WASH technical report, Water and Sanitation for Health Project, Arlington, VA, February 1992.
- Stomberg, Christopher. “How Well Are African Americans Housed: Past and Present?” Paper presented at “One Third of a Nation: An African American Perspective,” a conference, Washington, DC, November 1989.

Languages

- Spanish and Swedish (moderate fluency)

Professional associations and activities

- Contributor, Pharmaceutical Management Science Association (PMSA), 2004. Invited to contribute a presentation on microsimulation-based strategic marketing tools for the pharmaceuticals industry
- Member, American Bar Association
 - Antitrust Section

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- Healthcare Industry Committee
- Member, American Statistical Association
- Member, International Health Economics Association