

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

THIS DOCUMENT RELATES TO:
All Actions

MDL No. 2419
Master Docket No.: 1:13-md-2419-FDS

Honorable F. Dennis Saylor

DEMAND FOR JURY TRIAL

FIRST AMENDMENT TO MASTER COMPLAINT

Pursuant to Rule 15(a)(B) of the Federal Rules of Civil Procedure, the Plaintiffs' Steering Committee hereby files this First Amendment to the Master Complaint. This amendment is intended to add to the Master Complaint a Civil Conspiracy Count (Count XI-A) specifically against Saint Thomas Outpatient Neurosurgical Center, Howell Allen Clinic, Debra Schamberg, R.N. and John Culclasure, M.D. All other allegations of the Master Complaint remain unchanged.

**COUNT XI-A – CIVIL CONSPIRACY
(Against Clinic Related Defendants)**

364. All allegations in the original Master Complaint are incorporated herein by reference.

365. Defendant Saint Thomas Outpatient Neurosurgical Center, LLC, ("Saint Thomas Clinic") is a Tennessee for-profit limited liability company organized and domesticated under the laws of the State of Tennessee. Saint Thomas Clinic's principal place of business is located on the 9th floor of the Medical Plaza East office building on the Saint Thomas Hospital campus at 4230 Harding Pike in Nashville, Davidson County, Tennessee 37205. Saint Thomas

Clinic's registered agent for service of process is Gregory B. Lanford, M.D., 2011 Murphy Avenue, Suite 301, Nashville, Tennessee 37203.

366. Defendant Howell Allen Clinic A Professional Corporation, ("Howell Allen Clinic") is a Tennessee professional corporation organized and domesticated under the laws of the State of Tennessee with its principal place of business located in Nashville, Davidson County, Tennessee. Howell Allen Clinic's registered agent for service of process is Gregory B. Lanford, M.D., 2011 Murphy Avenue, Suite 301, Nashville, Tennessee 37203. Howell Allen Clinic owns one-half of Saint Thomas Clinic and receives one-half of that company's profits.

367. Defendant John Culclasure, M.D., ("Dr. Culclasure") is an individual residing at 1510 Demonbreun Street, Unit 1208, Nashville, Tennessee 37203 and a citizen and resident of the State of Tennessee. During all relevant times, Dr. Culclasure was an employee of the Howell Allen Clinic and the Medical Director of Saint Thomas Clinic. Dr. Culclasure is a medical doctor and practices in the specialty of anesthesiology. Dr. Culclasure was involved in the day to day operations at Saint Thomas Clinic.

368. Defendant Debra Schamberg, R.N., ("Ms. Schamberg") is an individual residing at 2644 Mossdale Drive, Nashville, Tennessee 37217 and a citizen and resident of the State of Tennessee. During all relevant times, Debra Schamberg was an employee of Howell Allen Clinic and the Facilities Director of Saint Thomas Clinic. Ms. Schamberg is a registered nurse and was involved in the day to day operations at Saint Thomas Clinic.

369. The decision by Saint Thomas Clinic to have NECC produce MPA for the clinic was made by Dr. Culclasure (the clinic's Medical Director) and Ms. Schamberg (the clinic's Facilities Director). Dr. Culclasure and Ms. Schamberg were employees of Howell Allen Clinic at the time that they made that decision, and they were acting within the course and

scope of their employment. Howell Allen Clinic is responsible for decisions made by Dr. Culclasure and Ms. Schamberg pursuant to the doctrine of *respondeat superior* and principles of agency. Dr. Culclasure and Ms. Schamberg were also duly authorized agents of Saint Thomas Clinic and where acting on the clinic's behalf as its Medical Director and Facilities Director. Saint Thomas Clinic is responsible for Dr. Culclasure's and Ms. Schamberg's decisions under principles of agency.

370. Saint Thomas Clinic, Howell Allen Clinic, Dr. Culclasure and Ms. Schamberg are hereinafter collectively referred to as "the Saint Thomas Clinic Defendants."

371. The Saint Thomas Clinic Defendants knew that NECC was a compounding pharmacy. The FDA defines pharmacy compounding as follows:

FDA regards traditional pharmacy compounding as the extemporaneous combining, mixing or altering of ingredients by a pharmacist in response to a physician's prescription to create a medication tailored to the specialized medical needs of an individual patient.

2006 Limited FDA Survey of Compounded Drug Products (emphasis added).

372. MPA is a prescription drug defined by 105 CMR § 700.002(F) as a Schedule VI controlled substance.

373. The FDA considers MPA to be a "prescription drug."¹

374. The Saint Thomas Clinic Defendants knew that MPA is a prescription drug.

375. The external packaging for MPA provided by NECC to Saint Thomas Clinic, as well as the external packaging for Depo-Medrol®, a brand name form of MPA manufactured by Pfizer, both indicate that MPA is a prescription drug.

376. The Saint Thomas Clinic Defendants acted in concert with NECC, and with NECC's agents and employees, to accomplish the common and unlawful purpose of violating

¹<http://www.accessdata.fda.gov/scripts/cder/drugsatfda/index.cfm?fuseaction=Search.Overview&DrugName=METHYLPREDNISOLONE%20ACETATE>

Massachusetts Board of Registration in Pharmacy (“Massachusetts Board of Pharmacy”) requirements prohibiting the distribution of MPA, a Schedule VI controlled substance, without patient specific prescriptions. Some of those requirements are referenced in an *ADVISORY* issued by the Massachusetts Board of Pharmacy. That *ADVISORY* is attached hereto as Exhibit 1 and incorporated herein by reference.

377. The Saint Thomas Clinic Defendants and NECC accomplished their common design via the unlawful means of using certain patient lists to accompany orders of MPA. The Saint Thomas Clinic Defendants used those patient lists even though some of the names listed were for patients who did not receive MPA and some of the names were fictitious, such as “Mickey Mouse.” The Saint Thomas Clinic Defendants undertook those overt acts in furtherance of the conspiracy.

378. The Saint Thomas Clinic Defendants knew that patient specific prescriptions were required in order for NECC to produce MPA lawfully. For example, NECC’s standard order form for MPA and other drugs requested patient specific information. Instead of filling out those standard forms properly, the Saint Thomas Clinic Defendants ordered NECC pharmaceuticals in bulk and thereafter submitted lists of patient names, regardless of whether the listed patients actually received the drug. Sometimes those lists included fictitious names such as “Mickey Mouse.”

379. The Saint Thomas Clinic Defendants were aware of NECC’s intent to use the subject patient lists in order to subvert Massachusetts Board of Pharmacy requirements. For example, in early to mid-2012, an NECC representative informed Ms. Schamberg that NECC needed to receive lists of patients with each order for MPA. The NECC representative explained that NECC needed those lists in order to comply with Massachusetts Board of Pharmacy

requirements. Ms. Schamberg then told the NECC representative that she could not predict which patients would receive MPA and therefore could not provide lists that would actually correspond with patients who receive MPA. In response, the NECC representative indicated that any list of patient names would suffice.

380. In response to NECC's request for assistance in papering over Massachusetts Board of Pharmacy requirements, Saint Thomas Clinic Defendants sent NECC lists of patients' names and addresses even though the listed patients did not necessarily receive MPA. Some of those lists contained fictitious names, including Mickey Mouse.

381. Saint Thomas Clinic Defendants' conduct in forwarding lists of patient names and addresses to NECC, even though those names did not correspond with patients who received MPA, violated Title II of the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"), Public Law 104-191, as amended, and the regulations related thereto codified in the Code of Federal Regulations Title 45, Subtitle A, Subchapter C, including 45 C.F.R. § 164.502. Saint Thomas Clinic Defendants engaged in that unlawful conduct in order to enhance clinic profits. Saint Thomas Clinic Defendants wanted to purchase MPA from the cheapest source possible regardless of whether the producer's methods were underhanded and illegal.

382. A true and correct copy of a verified interrogatory response by Saint Thomas Clinic discussing its communications with NECC and its use of patient lists is attached as Exhibit 2. That interrogatory response, dated April 30, 2013, was the first time that any Plaintiff had reason to know of the Saint Thomas Clinic Defendants' participation in the subject conspiracy.

383. Attached hereto as Exhibit 3 are hand written notes by Ms. Schamberg, Facilities Director of Saint Thomas Clinic, recording her affirmative knowledge that NECC requested patient lists in order to comply with Massachusetts Board of Pharmacy requirements.

384. The Saint Thomas Clinic Defendants knew or should have known that Tennessee law likewise requires individual prescriptions when procuring prescription drugs produced by a compounding pharmacy.

385. The Saint Thomas Clinic Defendants and NECC knew of each other's common intent to use the subject patient lists in order to circumvent the Massachusetts, Tennessee and federal prescription requirements.

386. The conspiracy among NECC and the Saint Thomas Clinic Defendants was a proximate and legal cause of harm to Plaintiffs. If the Saint Thomas Clinic Defendants and NECC had abided by the law requiring individual prescriptions, then NECC could not and would not have produced and sold MPA in bulk. Mass producing MPA and selling it across the country in bulk, while abiding by the individual prescription rule, was not logistically possible. The Saint Thomas Clinic Defendants conspired with NECC, in violation of the individual prescription rule, because the Saint Thomas Clinic Defendants desired to buy MPA from the cheapest and easiest source, thereby enhancing clinic profits. Rather than participating in the subterfuge of papering over the individual prescription rule by unlawfully sending the subject patient lists to NECC, the Saint Thomas Clinic Defendants should have declined to conspire with NECC. The Saint Thomas Clinic Defendants could have purchased MPA from a reputable, FDA regulated drug manufacturer such as Pfizer. Purchasing Depo-Medrol® was safer, although slightly more expensive. If the Saint Thomas Clinic Defendants had chosen to purchase Depo-

Medrol®, the safer name brand version of MPA manufactured by Pfizer, the entire fungal meningitis outbreak would have been avoided.

387. The Saint Thomas Clinic Defendants are liable for the acts of their co-conspirator NECC.

WHEREFORE, the Plaintiffs demand judgment against Saint Thomas Clinic Defendants, jointly and severally, on Count XI-A of this Complaint, in an amount that will justly compensate them for their damages, together with interest, costs and attorneys' fees incurred in this action, all within the jurisdictional limits of this Court.

Respectfully submitted,

LEADER, BULSO & NOLAN, PLC

Dated: January 31, 2014

/s/ George Nolan

George Nolan (B.P.R. No. 14974)
414 Union Street, Suite 1740
Nashville, Tennessee 37219
(615) 780-4111
gnolan@leaderbulso.com

*As Vice Chair for Tennessee and designated
counsel on behalf of the Plaintiffs' Steering
Committee*

/s/ Patrick T. Fennell

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Plaintiffs' Steering Committee

CERTIFICATE OF SERVICE

I, George Nolan, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

/s/ George Nolan

George Nolan



The Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Public Health
Division of Health Professions Licensure

DEVAL L. PATRICK
GOVERNOR

TIMOTHY P. MURRAY
LIEUTENANT GOVERNOR

JUDYANN BIGBY, MD
SECRETARY

JOHN AUERBACH
COMMISSIONER

Board of Registration in Pharmacy
239 Causeway Street, Suite 500, 5th Floor
Boston, MA 02114
(800) 414-0168
<http://www.mass.gov/dph/boards/pharmacy>

ADVISORY

COMPOUNDING PHARMACIES AND PHARMACISTS

The Board of Registration in Pharmacy reminds pharmacies and pharmacists who engage in compounding in the Commonwealth that Board Regulations (247 CMR) require that all actions be performed in accordance with United States Pharmacopeia (USP) Standards. 247 CMR 9.01(3). USP <795> addresses the practice for Non-Sterile Compounding and USP Standard <797> addresses the practice for Sterile Compounding Preparations

Massachusetts Pharmacies and Pharmacists are also reminded that Massachusetts General Law Chapter 94C, section 21 and Department of Public Health regulations (105 CMR 721.000) require that pharmacies and pharmacists dispense medications pursuant to a valid prescription from an authorized practitioner for a specific patient. This prescription must be valid as defined under Massachusetts statutes and regulations, not under the rules governing prescriptions in the recipient state.

Board licensees are advised to review USP standards and Board regulations 247 CMR 1.00 – 16.00 to assure that pharmacy practice is conducted in accordance with state and federal laws and regulations, as required by Massachusetts General Law Chapter 112, section 61 and Board regulation 247 CMR 9.01(1).

The Board advises that all compounding pharmacies and pharmacists should obtain and complete the respective USP Gap Analysis Tool(s) (©International Journal of Pharmaceutical Compounding), provided below, to determine preliminary compliance with the above-referenced USP standards.

Right-click → Open Hyperlink
[Gap Analysis Tool - USP <795>](#)
[Gap Analysis Tool - USP <797>](#)

The Board appreciates your prompt attention to this important advisory.

IN THE FIFTH CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE

WAYNE A. REED, individually and as)
 husband and next of kin of decedent,)
 DIANA E. REED,)
)
 Plaintiff,)
)
 v.)
)
 ST. THOMAS OUTPATIENT)
 NEUROSURGICAL CENTER, LLC,)
 HOWELL ALLEN CLINIC, a Professional)
 Corporation, SAINT THOMAS NETWORK,)
 SAINT THOMAS HEALTH, and SAINT)
 THOMAS HOSPITAL)
)
 Defendants.)

Case No. 13C417
 Jury Demand

ST. THOMAS OUTPATIENT NEUROSURGICAL CENTER, LLC'S
 RESPONSES TO PLAINTIFF'S FIRST SET OF INTERROGATORIES

Pursuant to Rules 26 and 33 of the Tennessee Rules of Civil Procedure, St. Thomas Outpatient Neurosurgical Center, LLC ("STOPNC"), by and through undersigned counsel, provides the following responses to Plaintiff Wayne Reed's First Set of Interrogatories.

2. Identify each communication (including face-to-face, telephone, email, or other communications) between NECC (including its agents, employees or representatives) and Saint Thomas Neurosurgical (including its agents, employees or representatives). For each communication identified, please provide the following information:

- a) the names, job titles, and contact information for each person involved in the communication;
- b) the date, time, length, mode and location of each communication or discussion;
- c) whether any notes, memoranda, recordings, writings or other records were kept of any of those conversations or communications; and
- d) state as specifically as possible what each party to the communication or conversation said and state what actions Saint Thomas Neurosurgical took, if any, as a result of each communication or conversation.

RESPONSE:

OBJECTION. Counsel for STOPNC objects to this Interrogatory on the grounds that it is overbroad. Furthermore, Counsel for STOPNC objects to this Interrogatory on the grounds that it seeks information privileged from discovery by the Tennessee Peer Review Law of 1967, Tenn. Code Ann. § 63-6-219 and/or the Tennessee Patient Safety and Quality Improvement Act of 2011, Tenn. Code Ann. §§ 63-1-150, 68-11-272. Specifically, STOPNC's discussions with its pharmacist consultant and any outside pharmacist regarding NECC are privileged from discovery and protected from use in this lawsuit as communications with a quality improvement committee. Subject to and without waiving said objections, the Defendant states that the following are believed to be the communications with NECC:

2010 FASCA Conference in Franklin, TN

Debra Schamberg spoke with John Notarianni as described in Response to Interrogatory #1. Ms. Schamberg remembers few specific details about the conversation, but she does recall specifically discussing Omnipaque with Mr. Notarianni. Ms. Schamberg can be contacted through counsel for STOPNC. STOPNC's last known contact information for Mr. Notarianni is below. Ms. Schamberg did not make any record of the conversation. Ms. Schamberg believes she gave a business card to Mr. Notarianni.

John L. Notarianni
Regional Sales Manager
Medical Sales Management
Representing: NECC
Cell Phone: (508)454-0779
jnotarianni@medicalsalesmgmt.com

Periodic Calls from Notarianni

Mr. Notarianni called every couple months to see whether NECC could offer anything to STOPNC. Ms. Schamberg did not make any records of these calls or take any actions based on them.

Phone call on May 4, 2011

Mr. Notarianni contacted Ms. Schamberg by telephone on May 4, 2011, as he typically would every couple months, to solicit STOPNC's business. The substance of the conversation is covered in Response to Interrogatory # 1.

Emails in May & June 2011

Ms. Schamberg and Mr. Notarianni exchanged emails through May and June 2011 negotiating on pricing. The emails have been produced in STOPNC's Responses to the Plaintiff's First Set of Requests for Production and speak for themselves regarding the content of the conversations. Ms. Schamberg did not create any additional records regarding the emails. See Response to Interrogatory # 1 for additional information.

Second Phone Call

It appears from the emails described above that a second phone conversation took place between Ms. Schamberg and Mr. Notarianni regarding pricing of the MPA. Ms. Schamberg made notes on the pricing guide initially provided by Mr. Notarianni. Those handwritten notes have been produced in STOPNC's Responses to Plaintiff's First Set of Requests for Production and speak for themselves. See Response to Interrogatory # 1 for additional information.

June 10, 2011 Email

On June 10, 2011, Debra emailed Mr. Notarianni to initiate the process of placing an order with NECC. The email has been produced in STOPNC's Responses to Plaintiff's First Set of Requests for Production, and it speaks for itself. See Response to Interrogatory # 1 for additional information.

June 10, 2011 Phone Call

On June 10, 2011, Mr. Notarianni called Ms. Schamberg to discuss the mechanics of placing an order. The credit application and order have been produced in STOPNC's Responses to Plaintiff's First Set of Requests for Production and speak for themselves. No additional records were created by Ms. Schamberg as a result of the call. See Response to Interrogatory # 1 for additional information.

2011 FASCA Conference

On September 15 or 16, 2011, Ms. Schamberg attended a FASCA conference in Gatlinburg, TN. Ms. Schamberg recalls briefly speaking with Mario Giamei, Mr. Notarianni's successor sales rep at NECC, but she does not recall anything specific about the conversation. Below is the most recent contact information STOPNC has for Mr. Giamei.

Mario G. Giamei Jr.
Regional Sales Manager
NECC (New England Compounding Center)
Toll Free: (800) 994-6322
Cell Phone: (508) 454-0219
mgiamei@medicalsalesmgmt.com

Betamethasone Orders

On or about December 12, 2011, Ms. Littleton contacted Mr. Giamei for a price quote on a 2 mL vial of preservative-free betamethasone injectable steroid. Mr. Giamei stated that NECC could provide it for \$18 per 2mL vial or that NECC could provide it for \$16 per 2 mL vial for orders of at least 100 vials.

Ms. Littleton made some notes during or after the call, which have been produced in STOPNC's Responses to Plaintiff's First Set of Requests for Production. The notes speak for themselves.

Ms. Littleton placed an order for ten (10) 2 mL vials of betamethasone on December 12, 2011. STOPNC continued to order betamethasone from NECC up until the fungal meningitis outbreak.

Ms. Littleton can be contacted through counsel for STOPNC.

Faxed Orders

Ms. Littleton faxed the orders to NECC. NECC called Ms. Schamberg and confirmed receipt of the orders. No records were made of those calls, and STOPNC took no actions as a result of the calls. Ms. Schamberg does not remember the name of the individual who called to confirm receipt of the orders. The order forms have been produced in STOPNC's Responses to Plaintiff's First Set of Requests for Production and speak for themselves.

Phone Calls in February 2012

On February 9, 2012, Ms. Schamberg contacted Mr. Giamei, to determine whether NECC could put different colored tops on the 2 mL vials of MPA to help distinguish them from the 1 mL vials.

On February 10, 2012, Mr. Giamei called Ms. Schamberg and informed her that he was working on her request. Mr. Giamei stated that another facility had made a similar request.

On February 13, 2012, Mr. Giamei called Ms. Schamberg and informed her that it would cost \$13.50 per 2 mL vial to change the color of the vial cap.

Ms. Schamberg made notes from all three calls which have been produced in STOPNC's Responses to Plaintiff's First Set of Requests for Production. The notes speak for themselves.

STOPNC did not place any orders for 2 mL MPA from NECC after February 15, 2012.

Conversation about needing 500 vials to keep pricing

On April 3, 2012, Ms. Littleton placed an order for 400 1mL vials of MPA. Mr. Giamei contacted Ms. Schamberg and informed her that in order to maintain pricing at \$6.50 per vial, STOPNC needed to order at least 500 vials.

Ms. Schamberg made a handwritten note regarding the call which has been produced in STOPNC's Responses to Plaintiff's First Set of Requests for Production. The note speaks for itself.

On April 9, 2012, Ms. Littleton resubmitted the order for 500 vials, and STOPNC ordered 500 vials from that point on.

June 20, 2012 Phone Call and Email with Julia Kinkel re: Omnipaque

On June 20, 2012, Ms. Schamberg contacted NECC to inquire about NECC providing Omnipaque to STOPNC. Ms. Schamberg spoke with Julia Kinkel. Ms. Kinkel emailed advertising information regarding Omnipaque and Isovue to Ms. Schamberg. The email has been produced in STOPNC's Responses to Plaintiff's First Interrogatories and speaks for itself.

Patient Lists

Mr. Giamei stopped by STOPNC in early to mid-2012 and spoke with Ms. Schamberg. He informed Ms. Schamberg that NECC needed STOPNC to submit a list of patients with each order. Debra informed Mr. Giamei that STOPNC would not be able to predict which patients would actually receive the MPA, and Mr. Giamei said that that was fine because NECC just needed a list of patient names. Mr. Giamei stated that the requirement came from the Massachusetts Board of Pharmacy.

Ms. Schamberg consulted with Dr. Culclasure and a pharmacist prior to sending the list of names.

Ms. Schamberg spoke with receptionist Sherri DeZwaan to determine the best way for STOPNC to provide such a list. Ms. DeZwaan suggested printing off the daily patient schedule. For the next several orders, when STOPNC needed to order MPA, Ms. Littleton asked Ms. DeZwaan to print off a list of names, which she did. On at least one occasion, Ms. DeZwaan was not at STOPNC when Ms. Littleton placed an order. Ms. Littleton submitted the order to NECC without a list, and NECC filled the order. The lists have been produced in STOPNC's Responses to Plaintiff's First Set of Requests for Production with patient names and addresses redacted.

September 20, 2012 Call to NECC regarding Lot Numbers and Sterility Testing

Cindy McClendon called Mr. Giamei on September 20, 2012 (along the suppliers of other medications used during epidural steroid injections) at Dr. Culclasure's request, to check and see whether there had been any other reports of patients with meningitis. Mr. Giamei emailed Ms. McClendon sterility testing results for all three recalled lots to Ms. McClendon. The email and testing results have been produced in STOPNC's Responses to Plaintiff's First Set of Requests for Production. Ms. McClendon can be contacted through counsel for STOPNC.

Mr. Giamei's visit to STOPNC in September 2012

On September 24, 2012, Mr. Giamei was on his way to a FASCA conference in Memphis and stopped in at STOPNC. Ms. Schamberg and Dr. Culclasure spoke with Mr. Giamei about the fungal meningitis outbreak. Mr. Giamei was adamant that the problem could not have come from NECC. He assured Dr. Culclasure and Ms. Schamberg that "this could not possibly be coming from us." Mr. Giamei stated that NECC complied with applicable sterility procedures and had a state-of-the-art facility. He even invited Ms. Schamberg and Dr. Culclasure to Massachusetts for a tour.

VERIFICATION

STATE OF TENNESSEE)
)
COUNTY OF DAVIDSON)

I, John W. Culclasure, M.D., Medical Director of Saint Thomas Outpatient Neurosurgical Center, LLC swear and affirm that:

1. I am the Medical Director of STOPNC.
2. I have read the said interrogatories, and the foregoing answers thereto are true according to the best of my knowledge, information, and belief.

**SAINT THOMAS OUTPATIENT
NEUROSURGICAL CENTER, LLC**

[Handwritten Signature]
By: John W. Culclasure, M.D.
Its: Medical Director

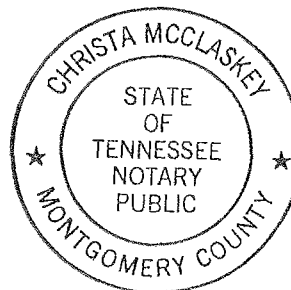
Sworn to and subscribed before me this 30th day of April, 2013.

Christa McClaskey

Notary Public

My Commission Expires:

Mardi, 14, 2017



CERTIFICATE OF SERVICE

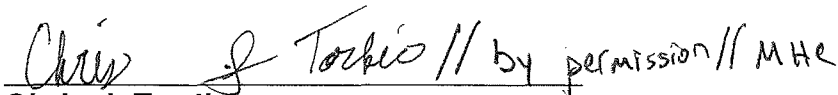
I hereby certify that a true and correct copy of the foregoing was served on the following via hand delivery and Email, on this 30th day of April, 2013:

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Chris J. Tardio

Call on Monday - 4/27 -

Debra Schamberg

From: John Notarianni [jnotarianni@medicalsalesmgmt.com]
Sent: Friday, May 20, 2011 11:57 AM
To: Debra Schamberg
Subject: RE: NECC Pricing?
Debra

CuraScript \$6.66

Clonidine \$6.49 12/14

How about \$12.00 for the 2 ml of the 80mg/ml methylprednisolone (PF)?

Thank you

John

1st order 48-72hrs -

*500-1ml - } \$6.50
200-2ml. } 12.00*

From: Debra Schamberg [mailto:dschamberg@howellallen.com]
Sent: Tuesday, May 17, 2011 5:52 PM
To: John Notarianni
Subject: RE: NECC Pricing?

John, if you can get your price under \$6.50 for 1ml vial, then we can talk.

Debra

John Notarianni

From: John Notarianni [mailto:jnotarianni@medicalsalesmgmt.com]
Sent: Tuesday, May 17, 2011 10:51 AM
To: Debra Schamberg
Subject: NECC Pricing?

Shipping } 24/48hrs

Debra

After our conversations I went back to my manager and he said he really would to earn your business. What price would we need to give you to gain your busi Methylprednisolone(PF) 80mg/ml 1ml and 2ml vials. Can you please let me ki allow us to work together? Thank you for your patience.

*500-1ml - } order done
200 2ml - } time*

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Regional Sales Manager
Medical Sales Management
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Cell Phone: (508)454-0779
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www.Neccrx.com

NECC - A vital resource for sterile and non-sterile compounding medications.

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from roster -
Board of Pharmacy requires
State of Mass -
Can submit (last name, Initial)*