

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION

Civil No. 19-2875 (RBK/JS)

This Document Relates to:

All Actions

STIPULATED ORDER EFFECTUATING AGREEMENT
REGARDING ESI SEARCH TERMS PERTAINING TO THE MYLAN DEFENDANTS

THIS MATTER HAVING COME before the Court on Defendants' Motion to Modify the ESI Search Terms (Dkt. 445); and

THIS COURT HAVING CONSIDERED the parties' submissions in support of and in opposition to said Motion, as well as the argument and representations of counsel made during the telephonic status conference on June 17, 2020,

IT IS HEREBY ORDERED, this the 22nd day of June 2020, as follows:

1) Based on affirmations from counsel that an agreement has been reached to resolve the parties' current dispute concerning ESI search terms, the Defendants' Motion to Modify the ESI Search Terms is **DENIED AS MOOT** only with respect to Mylan Pharmaceuticals Inc. and Mylan Laboratories Ltd. (collectively, "Mylan").

2) For purposes of effectuating and memorializing the agreement reached between Plaintiffs and Mylan, the Court **STATES FURTHER**:

a. Mylan will run the revised set of ESI search terms attached hereto as Exhibit A with respect to Mylan's nineteen (19) finished-dose custodians;

b. Mylan will run the revised set of ESI search terms attached hereto as Exhibit B with respect to all remaining custodians identified in Exhibit D of the Court's December 23, 2020 Order (Dkt. 328); and

c. The parties will confer in accordance with the ESI Protocol (Dkt. 125), as well as their representations and the Court's instructions made during the June 17, 2020 status conference, to resolve issues, if any, that might arise during the processing, review, and production of Mylan's ESI.

SO ORDERED.



JOEL SCHNEIDER
United States Magistrate Judge

EXHIBIT A

ghost
NDEA
NDMA
nitra* AND (<DRUG NAME> OR <Manufacturing Modifiers>)
nitrite
nitrosa
nitroso
NMBA
trosomine
C2H6N2O or "(CH3)2NN=O" or "CH32NN=O" or "(CH3)2NC(O)H" or CH32NCOH or C3H7NO or "(CH3CH2)2NH" or CH3CH22NH or C4H11N or "(CH3)2NH" or CH32NH or C2H7N or "(C2H5)2NNO" or C2H52NNO or C4H10N2O
deviat* /5 cancer* or deviat* /5 toxic or or deviat* /5 hazard* or deviat* /5 fatal
gene* /3 mutat*
solvent /5 cancer* or solvent /5 toxic or or solvent /5 hazard* or solvent /5 fatal
solvent* /5 contamin*
(test* /5 canc*) AND <Drug Name>
tetrazol*
Valisure*

<term> (no modifiers)^

^Except as indicated

Last Name	First Name	Facility
Agrawal	Atul	Nashik
Ford	Susanna	Nashik
Pitts	Simone	Nashik
Arroyo	Rafael	Nashik
Mueller	Eric	Nashik
Motemed	Massoud	Nashik
Melendez	Jose	Nashik
Shah	Dipesh	Nashik
Hicks	Kellia	Nashik
Warnick	William	Aurangabad
Verdel	Helen	Aurangabad
Cruz	Concepcion	Aurangabad
Dong	Eric	Aurangabad
Nguyen,	Truong	Aurangabad
Podaralla,	Satheesh	Aurangabad
Bretz	Paula	Morgantown
Warnick	William	Morgantown
Bizjak	Ernest	Morgantown
Ghoshal	Rabin	Morgantown
Chapman	Jonathan	Morgantown
Higgins	Brooke	Morgantown
Oladimeji,	Toyin	Morgantown
Xu	Qin	Morgantown
Agrawal	Atul	Morgantown
Motemed	Massoud	Morgantown
Upadhyay	Pratik	Morgantown
Wakijira	Chaltu	Morgantown
Rebecca	Dombrowski	Morgantown
Espinal	Nancy	Morgantown
Patel	Sneha	Morgantown
Patkar	Kshitij	Morgantown
Ileana	Barreto-Pettit	Morgantown
Mason	James	Morgantown
Min	Ko	Morgantown
Ray	Marcus	Morgantown
Roy	Melissa	Morgantown
Steig	Alison	Morgantown
Arasu	Tamil	Morgantown
Arista	Thomas	Morgantown
Marcisin	Sean	Morgantown
Mistler	John	Morgantown
Ulysse	Guerlain	Morgantown
Staub-Zamperini	Katelyn	Morgantown

"changes being effected"
"prior approval supplement"
adulterat*
alert* /5 safe*
CAPA or corrective pre/3 "preventive action"
Citizen* pre/3 Petition
(Establishment pre/3 Inspection)
import* /3 (ban or alert or restrict*)
Inspect* /500 <DRUG NAME>
Investig* /500 <DRUG NAME>
(official pre/3 action* /4 indicat*)
(observation or observations) /500 <DRUG NAME> or <FACILITY NAME> (excluding
(OOS or "out of spec*" or "out-of-spec*") /500 <DRUG NAME> or <FACILITY NAME> (excluding "Morgantown")
(OOT or "out-of-trend" or "out of trend") /500 <DRUG NAME>
PADER*
VAI or (voluntary pre/3 action* /4 indicat*)
violat* /500 <drug name> or <facility name>
warn* /500 <drug name > or <facility name>
OAI or "official action indicated"
"voluntary action indicated"
(Form483) or (Form /3 483) or (483 /3 letter) or (483 /3 warn*) or (704 pre/3 b)
EIR or "establishment inspection report"

**Except where indicated in
red, <Term> AND (<Drug
Name> OR <facility
name>**

((bottle pre/2 lies) or Eban) /200 ("inspect*" OR "FDA" OR "Food /300 Drug Administration" OR FDA OR USFDA OR "US-FDA" OR "Agency" OR "recall" OR <medical conditions> OR <drug name> OR test OR chromatog* OR peak)
(bury OR burie* OR conceal*) /200 ("inspect*" OR "FDA" OR "Food /300 Drug Administration" OR FDA OR USFDA OR "US-FDA" OR "recall" OR <drug name> OR test OR chromatog* OR peak OR EMPOWER)
(cGMP* or (current pre/5 manufacturing) or GMP*) /200 <DRUG NAME>
("cover up*" or coverup* or "cover-up*") /200 ("inspect*" OR "FDA" OR "Food /300 Drug Administration" OR FDA OR USFDA OR "US-FDA" OR "recall" OR EMPOWER OR <drug name> OR test OR chromatog* OR peak)
suppress* /200 ("inspect*" OR "FDA" OR "Food /300 Drug Administration" OR FDA OR USFDA OR "US-FDA" OR "recall" OR EMPOWER OR <drug name> OR test OR chromatog* OR peak)
malfunc* /200 (<drug name> OR "test" OR "chromatog*" or "Empower")
(crash* or disaster*) /200 (<drug name> OR "test" OR "chromatog*" or "Empower")
(data /4 integrity or data /4 reliabl*) /200 (<drug name> OR "test" OR "chromatog*" or "Empower")
(destroy* NOT "immediately destroy all electronic") /200 (<drug name> OR "test" OR "chromatog*" or "Empower")^
delet* /200 (<drug name> OR "test" OR "chromatog*" or "Empower")
trash* /200 (<drug name> OR "test" OR "chromatog*" or "Empower")
shred* /200 (<drug name> OR "test" OR "chromatog*" or "Empower")
(hide* OR suppress*) /200 "inspect*" OR "FDA" OR "Food /300 Drug Administration" OR FDA OR USFDA OR "US-FDA" OR "recall" OR <drug name> OR test OR chromatog* OR peak OR EMPOWER)
whistleblow* /200 "inspect*" OR "FDA" OR "Food /300 Drug Administration" OR FDA OR USFDA OR "US-FDA" OR "recall" OR <drug name> OR test OR chromatog* OR peak OR EMPOWER)

^Will not exclude responsive documents

"anion-exchange" or anionexchange or "anion exchange"
"ion-exchange" or ionexchange or "ion exchange"
PCRC
aberran* AND <DRUG NAME>
abnorm*
bioequiv*
CAPA or (corrective /3 action) or (preventative /5 action)
Chromato* /500 (<DRUG NAME> OR (unk* /3 peak*) or (unk* /3 spike*) OR (unk* /3 impurit*) or (unk* /3 contamin*))
contami* /500 (<DRUG NAME> OR <Manufacturing Modifiers>)
detect* /500 (<DRUG NAME> OR <Manufacturing Modifiers>)
EI-MS or EL-MS or "electron ionization"
elude*
fail* /500 <DRUG NAME>
GC or "GC-FID" or GCMS or "GC-MS"
("HS" or headspace)
HPLC-UV
incomplet* /5 data*
LCMS
method /5 qualification
noise*
obscure*
(peak* or impurit* or degradant*) AND (<DRUG NAME> OR (unk* /3 spike) or (unk* /3 contamin*))
problem* /200 <drug name>
puri* /200 <drug name>
recall* /200 <drug name>
repe* /4 error*
risk* /200 <drug name>
signal* AND (<DRUG NAME> OR (unk* /3 spike) or (unk* /3 contamin*))
(spectro* OR mass spec*) AND <drug name>
spike* /200 <drug name>
toxic* /200 <drug name>
validat* /200 <drug name>

**Except where indicated in red,
<Term> AND (<Drug Name> OR
<manufacturing modifiers>)**

(empower or chromatograph*) /200 assay* AND <DRUG NAME>
assessment* AND <DRUG NAME>
batch /3 records AND <DRUG NAME>
biocompat*AND <DRUG NAME>
(certificat* OR" COA") /300 <drug name>
critical /4 change AND <DRUG NAME>
deviat* /300 (<drug names> OR <manufacturing modifiers>)
discrepanc* /300 (<drug names> OR <manufacturing modifiers>)
(error* NOT "received this email in error ") /200 (<drug names> OR <manufacturing modifiers>)^
esterficat* AND <DRUG NAME>
material* /3 loss* AND <DRUG NAME>
reclaim* AND <DRUG NAME>
repack* or "re-pack*" AND <DRUG NAME>
resal* AND <DRUG NAME>
resell* AND <DRUG NAME>
moiety or moieties AND <DRUG NAME>
ring* AND (<drug names> OR <manufacturing modifiers>)

^Will not exclude responsive documents

bladder*
cancer* or precancer* or pre-cancer*
colon*
death or deaths or dead or deadly or fatal
esophag*
gastro*
intestin*
kidn* or renal*
laten*
leukemia*
liver*
lymphoma*
mutagen*
myeloma*
NHL or non-hodgkin*
toxicolog*
onset*
oncolog*
ovar*
pancrea*
prostate*
stomach*
("adverse event*" or AER)

**<Term> /200 (<Drug
Name>**

ABDC or Amerisource* or "American Health Packaging" or AHP
ANDA AND NOT ((abbreviated w/3 application) OR FDA)
Aurobindo
Hetero
Lantech*
Prinston
Teva
Torrent
Zhejiang*
Camber
ZHP

**<Term> /300 (<Drug
Name>**

Valsartan
Diovan*
Exforg*
sartan or sartans

<drug names modifiers>

CDER or "Center for Drug Evaluation and Research"
"Food and Drug Administration" or FDA or USFDA or "US-FDA" or "College Park"
"GDUFA"

<regulatory modifiers>

recall*
spike*
((unknown or unk) /3 peak) or ((unknown or unk) /3 spike) or ((unknown or unk) /3 impurit*) or ((unknown) or unk /3 contamin*) or ((unknown or unk) /3 degradant*)

<manufacturing modifiers>

"adverse event*" or AER*
bladder*
cancer* or precancer* or pre-cancer*
colon*
death* or dead or fatal
esophag*
gastro*
intestin*
kidn* or renal*
laten*
leukemia*
liver*
lymphoma*
MedWatch* or "Safety Information and Adverse Event Reporting"
muta*
myeloma*
NHL or non-hodgkin*
toxicolog*
onset*
oncolog*
ovar*
PADER*
pancrea*
prostate*
stomach*

<medical conditions modifiers>

3003937580 or Unit 3
3002785310 or Unit 8
3008316970 or Aurangabad
3005587313 or Nashik
1110315 or Morgantown or Chestnut Ridge

**<facility names
modifiers>**

EXHIBIT B

(*90483* OR *90866* OR *78020*)
OAI or "official action indicated"
"voluntary action indicated"
*diethylamine or "**diethyl amine"
*dimethylamine or "**dimethyl amine"
*dimethylformamide
*dimethylmethanamide
ghost
NDEA
NDMA
nitra
nitrite
nitrosa
nitroso
NMBA
trosomine
(Form483) or (Form /3 483) or (483 /3 letter) or (483 /3 warn*) or (704 pre/3 b)
C2H6N2O or "(CH3)2NN=O" or "CH32NN=O" or "(CH3)2NC(O)H" or CH32NCOH or C3H7NO or "(CH3CH2)2NH" or CH3CH22NH or C4H11N or "(CH3)2NH" or CH32NH or C2H7N or "(C2H5)2NNO" or C2H52NNO or C4H10N2O
carcin*
deviat* /5 cancer* or deviat* /5 toxic or or deviat* /5 hazard* or deviat* /5 fatal
FDA /10 warning
gene* /3 mutat*
solvent /5 cancer* or solvent /5 toxic or or solvent /5 hazard* or solvent /5 fatal
solvent* /5 contamin*
(test* /5 canc*) AND (<Drug Name> OR (<Solvents> AND NOT <other drug names>))
tetrazol*
Valisure*

<term> (no modifiers)^

^Except if run against custodians in management over more than one facility, in which case to be run as indicated in agreed to procedure.

Last Name	First Name	Facility	Inspection Date
Philopoulos	Constantin	Unit 8	8.2.12
Bonita	Chester	Unit 8	4.17.12
George	Jogy	Unit 8	8.10.17
Bernard	Tonia	Unit 8	4.13.18
Akhtar	Saleem	Unit 8	12.10.18
Brown	Darren	Unit 8	12.10.18
Patel	Nayan	Unit 8	12.10.18
Martinez	Miguel	Unit 8	6.5.19
Srivastava,	Rajiv	Unit 8	6.5.19
Matthews	Sony	Unit 3	2.3.14

("adverse event*" or AER) and (<drug name> or <solvents> or <facility names>)
"changes being effected"
"prior approval supplement"
adulterat*
(alert or alerts) w/500 (drug name or (solvents and NOT other drug names) or facility names or regulatory modifiers)
CAPA or corrective pre/3 "preventive action"
CFR or eCFR or "code of federal regulations" or USC or "United States Code" or "Title 21"
Citizen* pre/3 Petition
(Establishment pre/3 Inspection)
import* /3 (ban or alert or restrict*)
inadequat*
inspect* /200 (drug name or (solvents and NOT other drug names) or facility names or regulatory modifiers)
investigat* /200 (drug name or (solvents and NOT other drug names) or facility names or regulatory modifiers)
major /3 change
(master /3 file) and (<drug name> or <solvents>)
minor /3 change
moderate /3 change
Monthly /3 update
(official pre/3 action* /4 indicat*)
(observation or observations) /500 (drug name or (solvents and NOT other drug names) or facility names or regulatory modifiers)

(OOS or "out of spec*" or "out-of-spec*") /500
(drug name or (solvents and NOT other drug
names) or facility names or regulatory modifiers)

OOT or "out-of-trend" or "out of trend"

PADER* and (<drug name> or <solvents> or
<facility names>)

VAI or (voluntary pre/3 action* /4 indicat*)

violat*

warn*

EIR or "establishment inspection report"

genotoxic*

Except where indicated in red, <Term> AND (<Drug Name> OR (<Solvents> AND NOT <other drug names>) OR <regulatory modifiers> OR <facility names>)

((bottle pre/2 lies) or Eban) /200 ("inspect*" OR "FDA" OR "Food /300 Drug Administration" OR FDA OR USFDA OR "US-FDA" OR "Agency" OR "recall" OR <medical conditions> OR <drug name> OR <solvents> OR test OR chromatog* OR peak)
(bury OR burie* OR conceal*) /200 ("inspect*" OR "FDA" OR "Food /300 Drug Administration" OR FDA OR USFDA OR "US-FDA" OR "Agency" OR "recall" OR <medical conditions> OR <drug name> OR <solvents> OR test OR chromatog* OR peak)
(cGMP* or (current pre/5 manufacturing) or GMP*) /200 (<drug name> OR <solvents> OR inspect* OR violat*)
("cover up*" or coverup* or "cover-up*") /200 ("inspect*" OR "FDA" OR "Food /300 Drug Administration" OR FDA OR USFDA OR "US-FDA" OR "Agency" OR "recall" OR <medical conditions> OR <drug name> OR <solvents> OR test OR chromatog* OR peak)
(crash* or disaster*) /200 (<drug name> OR <solvents> OR "backup /3 data" OR "test")
(data /4 integrity or data /4 reliabl*) /200 (<drug name> OR <solvents> OR "backup /3 data" OR "test" or chromatog*)
(destroy* NOT "immediately destroy all electronic") /200 (<drug name> OR <solvents> OR facilities names OR test OR chromatog* OR backup /3 data)^
delet* /200 (<drug name> OR <solvents> OR facilities names OR test OR chromatog* OR backup /3 data)
trash* /200 (<drug name> OR <solvents> OR facilities names OR test OR chromatog* OR backup /3 data)
shred* /200 (<drug name> OR <solvents> OR facilities names OR test OR chromatog* OR backup /3 data)
(hide* OR suppress*) /200 ("inspect*" OR "FDA" OR "Food /300 Drug Administration" OR FDA OR USFDA OR "US-FDA" OR "Agency" OR "recall" OR <medical conditions> OR <drug name> OR <solvents> OR test OR chromatog* OR peak)
whistleblow* /200 ("inspect*" OR "FDA" OR "Food /300 Drug Administration" OR FDA OR USFDA OR "US-FDA" OR "Agency" OR "recall" OR <medical conditions> OR <drug name> OR <solvents> OR test OR chromatog* OR peak)

^Will not exclude responsive documents

"anion-exchange" or anionexchange or "anion exchange"
"ion-exchange" or ionexchange or "ion exchange"
PCRC
aberran*
abnorm*
ALS
bioequiv*
CAPA or corrective pre/5 action
Chromato* /500 (drug name OR (solvents AND NOT other drug names) OR manufacturing modifiers)
contami*
degradant*
detect* /200 (drug name OR (solvents AND NOT other drug names) OR manufacturing modifiers)
EI-MS or EL-MS or "electron ionization"
elude*
fail* /500 (drug name OR (solvents AND NOT other drug names))
fatal*
GC or "GC-FID" or GCMS or "GC-MS"
hazard*
headspace
heat
HPLC-UV
HS
incomplet* /5 data*
LCMS
mass spectro*
method /5 qualification
noise*
noti* w/5 pharm*
obscure*
peak*
press /4 release
preventative /5 action
problem* /200 (drug name OR (solvents AND NOT other drug names) OR manufacturing modifiers)

puri* /200 (drug name OR (solvents AND NOT other drug names) OR manufacturing modifiers)
recall*
repe* /4 error*
residu* - residu* /200 (drug name OR (solvents AND NOT other drug names) OR manufacturing modifiers)
retrospec*
risk* /200 (drug name OR (solvents AND NOT other drug names) OR manufacturing modifiers)
signal*
spectro*
spike*
toxic*
unknown* or unk or unks
validat* /200 (drug name OR (solvents AND NOT other drug names) OR manufacturing modifiers)
genotoxic*

Except where indicated in red, <Term> AND (<Drug Name> OR (<Solvents> AND NOT <other drug names>) OR <manufacturing modifiers>)

"PROCESS I" or "PROCESS II"
assay*
assessment* /200 (drug name OR (solvents AND NOT other drug names) OR manufacturing modifiers)
batch /5 records
biocompat*
byproduct*
CAPA or corrective pre/3 "preventive action"
certificat*
change* /3 control*
change* /5 process*
COA or certificat* pre/3 analys*
concentra*
condensa*
conversion*
critical /4 change
crude*
deviat*
diastereo*
discrepanc*
(error* NOT "received this email in error ") /200 (drug name OR (solvents AND NOT other drug names) OR manufacturing modifiers)^
esterficat*
expir*
formaldehyde
malfunc*
material* /3 loss*
moiety or moieties
process /5 change
quench*
reagent*
reclaim*
recover* /200 (drug name OR (solvents AND NOT other drug names) OR manufacturing modifiers)
recycli* /200 (drug name OR (solvents AND NOT other drug names) OR manufacturing modifiers)
repack* or "re-pack*"
resal*
resell*

reuse*
ring*
solvent /200 (drug name OR (solvents AND NOT other drug names) OR manufacturing modifiers)
suppress*
TEA or Triethyl*
TIN or Tributyl*
yield* /200 (drug name OR (solvents AND NOT other drug names) OR manufacturing modifiers)

^Will not exclude responsive documents

**Except where indicated in red, <Term> AND
(<Drug Name> OR (<Solvents> AND NOT <other
drug names>))**

bladder*
cancer* or precancer* or pre-cancer*
colon*
(death or deaths or dead or deadly or fatal) w/200 (drug name OR (solvents AND NOT other drug names) OR medical term modifiers)
esophag*
gastro*
intestin*
kidn* or renal*
laten*
leukemia*
liver*
lymphoma*
muta*
myeloma*
NHL or non-hodgkin*
toxicolog*
onset*
oncolog*
ovar*
pancrea*
prostate*
stomach*

Except where indicated in red, <Term> AND (<Drug Name> OR (<Solvents> AND NOT <other drug names>))

AWP or "average wholesale price" or WAC or "wholesale acquisition cost"
best /3 pric*
bulk /3 suppl*
impairment
IRR
manufactur* /3 cost*
marginal /5 cost*
market* /5 share*
net /5 profit*
net /5 valu*
NPA
NPV
rate /10 return
rebate*
sourc* w/5 agree* or sourc* w/5 anal* or sourc* w/5 contract* or sourc* w/5 forecast* or sourc* w/5 plan* or sourc* w/5 strat*
suppl* w/5 agree* or suppl* w/5 anal* or suppl* w/5 contract* or suppl* w/5 forecast* or suppl* w/5 plan* or suppl* w/5 strat*
SWOT or (strength pre/7 threat*)
writ* pre/5 off
(ABDC or Amerisource* or "American Health Packaging" or AHP) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss)
(AG) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or gross or gross or loss)
(amerisource*) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss)
(ANDA) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss)

<Term> AND (<Drug Name> OR (<Solvents> AND NOT <other drug names>))[^]

[^]To be run against economic custodian(s) only

(ASB) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss)
(Authorized /4 generic) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share)
(average or avg) AND (pric* or cost* or margin* or profit* or revenue*)
(avg) AND (pric* or cost* or margin* or profit* or revenue*)
(boehringer ingelheim) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss)
(cardinal) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss)
(contract) AND (distrib* or PBM)
(cost*) AND (analy* or forecast* or plan* or strat*)
(CVS*) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss)
(Epic) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss)
(ESI) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss)
(Express*) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss)
(IMS) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or loss)
(IQVIA) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or loss)
(Kroger) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or loss)
(mckesson) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or loss)
(operat* w/5 margin*) AND (margin* or profit*)

(Optum*) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or loss)
(pric*) AND (decreas* or increas* or list* or strat* or expect* or project*)
(recall) AND (loss or impairm* or write* or reimburs* or indemn* or charg* or replace*)
(Redoak) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or loss)
(retail) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or loss)
(Rite*) AND (pric*)
(sales) /5 (expect* or project*)
(var*) /5 (cost*)
(variable) /5 (cost*)
(Walgreen* or WBDA) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss)
(Walmart) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss)

Alembic
ABDC or Amerisource* or "American Health Packaging" or AHP
Amerigen
ANDA AND NOT ((abbreviated w/3 application) OR FDA)
Auro* or APL or APUSA
boehringer ingelheim
Bristol
Camber
Cobalt
Forest
Hetero
Huahai
Indoco
Ivax
Jubilant
Lantech*
Macleod*
Novartis
Par
Prinston
Qualanex
Ranbaxy
Sandoz
Syncore
Synthon
Teva
Torrent
Unichem
Watson
Zhejiang*
ZHP

**<Term> AND (<Drug
Name> OR (<Solvents>
AND NOT <other drug
names>))**

Valsartan
Diovan*
Exforg*
sartan or sartans

<drug names modifiers>

azide
formaldehyde
-N3
xylene
aqueous*
chloramin*
HNO2
hydrochlor*
N-3*
NaNO*
tolue*
Tributyl* or TIN
Triethyl* or TEA
zinc /3 chloride
Amlodipine
HCT or HCTZ
ZnCl*

<solvents modifiers>

"Abbreviated New Drug Application" or ANDA
CDC or "Centers for Disease Control"
CDER or "Center for Drug Evaluation and Research"
DEA or "Drug Enforcement Administration" or "Drug Enforcement Agency"
"Environmental Protection Agency" or EPA or USEPA or "US-EPA" or "1200 Pennsylvania Avenue"
"Food and Drug Administration" or FDA or USFDA or "US-FDA" or "College Park"
NIH or "National Institutes of Health"

<regulatory modifiers>

"adverse event*" or AER*
bladder*
cancer* or precancer* or pre-cancer*
colon*
death* or dead or fatal
esophag*
gastro*
intestin*
kidn* or renal*
laten*
leukemia*
liver*
lymphoma*
MedWatch* or "Safety Information and Adverse Event Reporting"
muta*
myeloma*
NHL or non-hodgkin*
toxicolog*
onset*
oncolog*
ovar*
PADER*
pancrea*
prostate*
stomach*

<medical conditions modifiers>

3003937580 or Unit 3
3002785310 or Unit 8
3008316970 or Aurangabad
3005587313 or Nashik
1110315 or Morgantown or Chestnut Ridge

**<facility names
modifiers>**

analys*
AWP
cost*
decreas*
distrib*
expect*
gross
impairm*
increas*
indem*
list*
loss*
margin*
market*
net
PBM
plan
pric*
profit*
project*
recall*
revenue*
share*
stock*
strat*
WAC
write*

<economic modifiers>

backup /3 data
impurit* and degradant*
recall*
residu*
solvent*
spike*
test*
unknown /3 peak or unknown /3 spike or unknown /3 impurit* or unknown /3 contamin*
acid*
Complain*

**<manufacturing
modifiers>**