EXHIBIT 77
From: Colucci, Dan
Subject: SOP 7.7 System to disclose suspicious orders of controlled substances

SOP PDF

As you know we have an SOP 7.7 for reviewing suspicious orders--copy attached. These are defined as, "orders of unusual size, orders that deviate substantially from normal buying patterns, or orders of unusual frequency."

In the last week we have received very significant orders from Anda Pharmaceutical a unit of Watson Pharmaceutical Inc. For the past 2 years they have operated successfully with an $800,000 line of credit and similar exposures. Late last week they placed an order for $1,682,000 for their Ohio location. Virtually all of it was for OxyContin 40 and 80 mg strengths. This was approved with input from sales and then credit approved following our approval SOP. Yesterday we received additional orders for $2,050,000 with a very significant order of 80 mg product for the Ohio location.

Today Steve Seid spoke with Anda's buying group and they outlined their reasons for the increased purchases below. Based on Anda's comments sales would like to see us okay the order. As part of Watson they are okay financially and we can justify a $5.0mm+ exposure.

Please let us know if you have any questions or if you agree.

PS: Per the SOP I could have contacted Chuck when I contacted Steve but I felt it might be a duplicate order so I thought it best to let Steve check first.

-----Original Message-----
From: Seid, Stephen
Sent: Wednesday, June 06, 2007 4:08 PM
To: Colucci, Dan; Siciliano, Cheryl
Subject: RE: Watson's Anda division

Dan,

ANDA has seen a rise in demand particularly at the Ohio facility. Example 40mg averaged 130 to 140 units/mo. In the Nov to Feb period March 327 April 280 May 435/. 80mg avg high 200 to low 300 units per month. April 425 May 876.

Please release order.

Steve Seid
National Accounts
Trade Relations

-----Original Message-----
From: Colucci, Dan
Sent: Wednesday, June 06, 2007 9:41 AM  
To: Siciliano, Cheryl; Seid, Stephen  
Subject: FW: Watson's Anda division  
Importance: High

Steve when you can please call me.

-----Original Message-----
From: Colucci, Dan  
Sent: Tuesday, June 05, 2007 9:20 PM  
To: Lowne, Jon; Dicocco, Tony; Bishop, Steve; Seid, Stephen  
Subject: RE: Watson's Anda division  
Importance: High

Jon & Tony, this needs to be discussed further. I'll explain in the am.

Steves, is it possible they would need another $2.0mm in product? $413,000 is for Weston—okay. A new $1,648,000 for Ohio again. On 6/4 we shipped $1,682,000. Can we talk tomorrow?

-----Original Message-----
From: Dicocco, Tony  
Sent: Tuesday, June 05, 2007 3:47 PM  
To: Lowne, Jon  
Cc: Colucci, Dan  
Subject: Watson's Anda division

Hi Jon,

I have two orders totaling $2,062,201.44 for Watson's Anda division. I believe last week Dan had contacted you with another order and the line got bumped up to 2.5mm. The currently have a $2.5mm line of credit now and with these two orders it takes them up to $4,504,099.17. The Watson AG account is overall significantly lower due to the Feb decision and that total for Watson AG is $3.9mm.

Thanks

Tony

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