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July 30, 2018

BY CM/ECF & HAND DELIVERY

The Honorable Leonard P. Stark
United States District Court
844 N. King Street
Wilmington, DE 19801

Re: *Bayer Healthcare LLC, et al. v. Teva Pharmaceuticals USA, Inc.*,
C.A. No. 16-1221-LPS

Dear Chief Judge Stark:

The parties in the above referenced matter write to request the scheduling of a discovery teleconference.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a verbal meet-and-confer (in person and/or by telephone) on the following date(s), one or more of which relate to the disputes identified below:

March 2, 2018

Delaware Counsel: Derek Fahnestock (Plaintiffs)
David Frye (Teva Defendant)
Kenneth Dorsney (Apotex Defendant)

Lead Counsel: Jessica Rydstrom, Seth Bowers, Ben Picozzi (Plaintiffs)
Jennell Bilek, Shelleaha Jonas (Teva Defendant)
Philip Kouyoumdjian (Apotex Defendant)

April 19, 2018

Delaware Counsel: Derek Fahnestock (Plaintiffs)
David Frye (Teva Defendant)
Charles Toliver (Apotex Defendant)

Lead Counsel: Jessica Rydstrom, Dov Grossman, Ben Picozzi (Plaintiffs)
Jennell Bilek, Shelleaha Jonas (Teva Defendant)
Philip Kouyoumdjian (Apotex Defendant)

April 30, 2018

Delaware Counsel: Derek Fahnestock (Plaintiffs)

David Frye (Teva Defendant)
Kenneth Dorsney (Apotex Defendant)

Lead Counsel: Jessica Rydstrom, Ben Picozzi (Plaintiffs)
Jennell Bilek, Shelleaha Jonas (Teva Defendant)
Philip Kouyoumdjian, Ian Scott (Apotex Defendant)

May 16, 2018

Delaware Counsel: Derek Fahnestock (Plaintiffs)
Nathan Hoeschen (Teva Defendant)
Kenneth Dorsney (Apotex Defendant)

Lead Counsel: Jessica Rydstrom, Seth Bowers (Plaintiffs)
Jennell Bilek, Shelleaha Jonas (Teva Defendant)
Philip Kouyoumdjian, Ian Scott (Apotex Defendant)

July 13, 2018

Delaware Counsel: Derek Fahnestock (Plaintiffs)
Nathan Hoeschen (Teva Defendant)
Kenneth Dorsney (Apotex Defendant)

Lead Counsel: Ben Picozzi, Seth Bowers (Plaintiffs)
Shelleaha Jonas (Teva Defendant)
Philip Kouyoumdjian (Apotex Defendant)

The disputes requiring judicial attention are listed below:

- Plaintiffs' production of custodial research and development documents in response to Defendants' Request Nos. 18-19, 22, and 26
- Plaintiffs' production of certain documents from previous litigations involving one of the patents asserted in this case and/or the development of the invention claimed therein in response to Defendants' Request Nos. 84-86 and 88-89

Respectfully submitted,

/s/ Nathan R. Hoeschen

Nathan R. Hoeschen (No. 6232)

cc: Clerk of the Court (by hand delivery)
Counsel of Record (by CM/ECF)