

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

GENENTECH, INC. and CITY OF HOPE,	)	
	)	
Plaintiffs and Counterclaim Defendants,	)	C.A. No. 17-1672-GMS
	)	
v.	)	
	)	
PFIZER INC.,	)	
	)	
Defendant and Counterclaim Plaintiff.	)	

**SUPPLEMENTAL JOINT STATUS REPORT**

The parties hereby submit this supplemental joint status report to update the Court on two issues addressed in the Joint Status Report submitted on February 12, 2018 (D.I. 15).

**Discovery Limits**

In the Joint Status Report (D.I. 15 at 10), the parties stated that they would confer regarding appropriate discovery limits for this action upon the completion of the parties' exchanges under the BPCIA in March 2018 and agreed to submit a joint proposal for discovery limits by March 16, 2018. Having now completed the BPCIA exchanges, the parties have discussed case narrowing and jointly propose the following limits on discovery:

Requests for Production: No limit.

Interrogatories: Up to 50 interrogatories by each side to any other side.

Requests for Admission: Up to 150 requests for admission by each side to any other side, exclusive of requests for admission to authenticate documents. The parties will work together to reach an agreement concerning the authenticity of the parties' respective documents to reduce the need for requests for admission to authenticate documents.

Fact Depositions: Up to 250 hours of depositions for each side for any fact witnesses, including Rule 30(b)(6) depositions and depositions of third parties. All depositions of current employees of the parties, inventors, and Rule 30(b)(6) witnesses of the parties will occur in the United States.

These discovery limits are based upon the parties' current understanding of the scope of the case. The parties agree to confer in good faith regarding these discovery limits should the scope of the case change in the future.

**Amended Complaint**

In the Joint Status Report (D.I. 15 at 10), the parties proposed a March 16, 2018 deadline by which Genentech was to file an amended complaint reflecting any case narrowing upon the completion of exchanges under the BPCIA. The parties are currently discussing Genentech's proposed amended complaint and a potential stipulation to dismiss certain patents from the case. The parties jointly agree to extend the proposed deadline for Genentech to file an amended complaint to March 23, 2018.

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Dated: March 16, 2018