

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

GENENTECH, INC.,

Plaintiff,

v.

AMGEN INC.,

Defendant.

C.A. No. 18-924-CFC

AMGEN'S MOTION TO COMPEL

Defendant Amgen Inc. respectfully requests that the Court compel: (1) the continued deposition of inventor Dr. Sharon Baughman in view of a critical late-produced email implicating Dr. Brian Leyland-Jones as inventor of the Dosing Patents; (2) production of an unredacted form of the late-produced email referenced above and originally produced on July 23, 2019; (3) production of documents in the possession of Roche, Genentech's parent entity, relating to Dr. Leyland-Jones and the BO15935 clinical trial that he led; (4) denial of Genentech's motion for a protective order to prevent a deposition of Dr. Leyland-Jones; and (5) production of documents and a 30(b)(6) witness related to licensing the patents-in-suit. The grounds for this motion are set forth in the accompanying discovery dispute letter, and the specific relief is set forth in the Proposed Order, filed herewith.

Dated: October 4, 2019

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