

EXHIBIT 1

Unga, Laura

From: Gunther, Jr., Robert J. <Robert.Gunther@wilmerhale.com>
Sent: Wednesday, August 28, 2019 5:06 PM
To: z/Amgen-Genentech
Cc: WH GNE-Amgen Herceptin Service List; Stern, Joshua; DDurie@durietangri.com; abrausa@durietangri.com; EWiener@durietangri.com; DMcGowan@durietangri.com
Subject: Depositions of Amgen Witness

Counsel:

In view of Amgen's waiver of privilege, its recent interrogatory responses and the Court's order of today's date denying Amgen's motion for reargument, Genentech intends to depose at least the Amgen employees identified below. Please provide their availability for deposition as soon as possible.

[REDACTED]

Genentech reserves the right to seek the depositions of additional individuals based on the above depositions and our review of Amgen's document production per the Court's order.

In addition, please promptly provide a response to our August 26 email regarding the the deposition transcript of Eli Loots in the Avastin matter.

Regards,

Bob

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EXHIBIT 2



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Transcript of Lois Kwasigroch

Date: September 17, 2019

Case: Genentech -v- Amgen (18-924-CFC)

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