

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

GENENTECH, INC.,

Plaintiff,

v.

AMGEN INC.,

Defendant.

C.A. No. 18-924-CFC-SRF

JOINT MOTION FOR TELECONFERENCE

Plaintiff Genentech, Inc. and Defendant Amgen Inc. by and through their undersigned counsel, respectfully move this Court to schedule a teleconference to address outstanding disputes regarding the following discovery matters:

- 1) Amgen's redaction of all references to and information about its other products other than Kanjinti (its trastuzumab biosimilar), including Mvasi (its bevacizumab biosimilar), from its documents; and
- 2) The scope of document collection and production of email in connection with the damages discovery portion of this matter.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a verbal meet-and-confer by telephone on November 25, 2019.

Genentech's Delaware Counsel: Daniel M. Silver, Esq., McCarter & English, LLP

Genentech's Lead Counsel: Eric Wiener, Esq. and Henry Huttinger, Esq., Durie Tangri LLP, Sonal Mehta, Esq. and Andrew Danford, Esq., Wilmer Cutler Pickering Hale and Dorr LLP

Amgen's Delaware Counsel: Neal Belgam, Esq., Smith, Katzenstein & Jenkins LLP

Amgen's Lead Counsel: Orion Armon, Esq., Cooley LLP

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a second verbal meet-and-confer by telephone on December 11, 2019.

Genentech's Delaware Counsel: Daniel M. Silver and Alexandra Joyce, Esq., McCarter & English, LLP

Genentech's Lead Counsel: Eric Wiener, Esq. and Henry Huttinger, Esq., Durie Tangri LLP, Andrew Danford, Esq., Wilmer Cutler Pickering Hale and Dorr LLP

Amgen's Delaware Counsel: Neal Belgam, Esq., Smith, Katzenstein & Jenkins LLP

Amgen's Lead Counsel: Orion Armon, Esq. and Priya Arora, Cooley LLP.

The parties are available for a teleconference on the following dates: January 6, January 7, and January 8, 2020.

Dated: December 19, 2019

MCCARTER & ENGLISH, LLP

SMITH KATZENSTEIN & JENKINS
LLP

/s/ Daniel M. Silver

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Attorneys for Defendant Amgen Inc.

Attorneys for Plaintiff Genentech, Inc.

SO ORDERED this ____ day of _____, 2019.

United States Magistrate Judge