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EXHIBIT F

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LAW OFFICES WILLIAMS & CONNOLLY LLP*

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October 19, 2023

HIGHLY CONFIDENTIAL - OUTSIDE COUNSEL'S EYES ONLY

Via Email

Mark C. McLennan KIRKLAND & ELLIS LLP 601 Lexington Avenue New York, NY 10022 (212) 909-3451 mark.mclennan@kirkland.com

Re: Arbutus Biopharma Corporation and Genevant Sciences GmbH v. Moderna, Inc. and ModernaTX, Inc., Case 1:22-cv-00252-MSG (D. Del.)

Dear Mark:

DOCKE.

RM

We write in response to Moderna's September 7, 2023 letter regarding Plaintiffs' responses to Moderna's First Set of Interrogatories (Nos. 1–7) and First Set of RFPs (Nos. 1–100).

I. Plaintiffs' Interrogatory Responses

A. Interrogatory No. 3



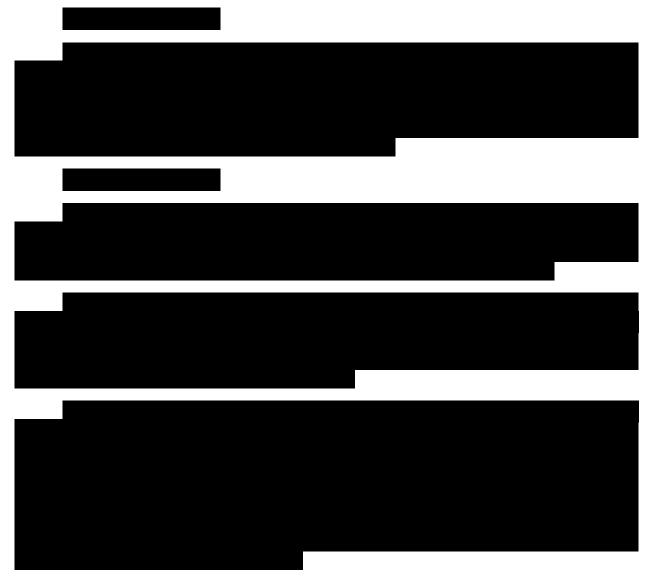
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II. Plaintiffs' RFP Responses

A. General Issues

Third-Party Confidentiality: As we have noted in our October 10, 2023 email, Plaintiffs intend to redact third-party confidential information that is otherwise not responsive or relevant to the subjects in dispute, or the categories of documents that Plaintiffs have agreed to produce. Moderna has requested, and Plaintiffs have agreed to produce, documents spanning decades of work, across at least five different companies, and Plaintiffs and their predecessors have entered into hundreds of agreements that contain confidentiality obligations over that period of time. Plaintiffs do not intend to engage in an unnecessary and unduly burdensome exercise of obtaining disclosure from every party whose otherwise irrelevant information appears in documents that Plaintiffs have agreed to produce. As evidenced by at least Moderna's search terms and Plaintiffs'

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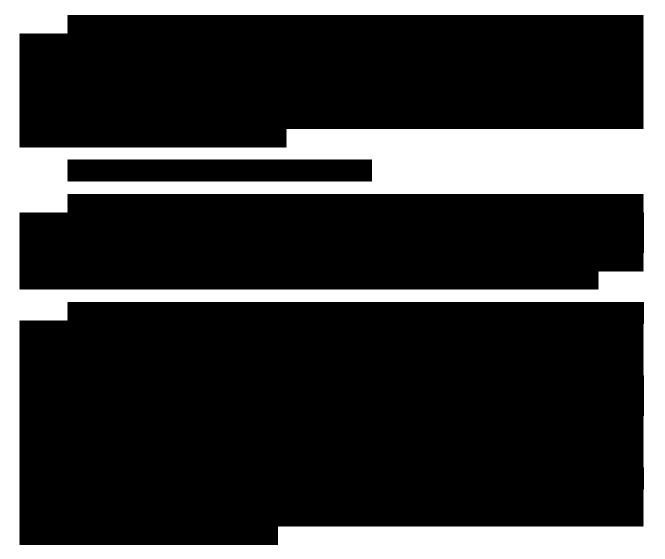
response to Moderna's Interrogatory No. 3, Plaintiffs have already identified implicated third parties and Moderna is aware of them. To the extent that Moderna has specific questions regarding any redactions, Plaintiffs are willing to discuss such redactions with Moderna.



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B. Specific RFP Responses

RFP No. 2. Plaintiffs have agreed to produce the second second as defined in prior correspondence, in addition to the the second seco

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