

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

HOSPIRA, INC.	)	
	)	
Plaintiff,	)	C.A. Nos. 1:16-cv-00651
	)	1:17-cv-07903
v.	)	
	)	Hon. Rebecca R. Pallmeyer
FRESENIUS KABI USA, LLC	)	
	)	
Defendant.	)	

**DECLARATION OF TARA L. KURTIS IN SUPPORT OF FRESENIUS KABI'S  
MOTION FOR PARTIAL SUMMARY JUDGMENT ON PRIOR SALE**

I, Tara L. Kurtis, so hereby declare as follows:

1. I am an attorney with the firm of Schiff Hardin LLP, counsel for Defendant Fresenius Kabi USA, LLC in the above action. I make this Declaration in support of Fresenius Kabi's MOTION FOR PARTIAL SUMMARY JUDGMENT ON PRIOR SALE.

2. Attached as Exhibit A is a true and correct copy of a document marked with bates numbers HOSPIRA\_00308480-541, 00308723-26, and 00308751-56.

3. Attached as Exhibit B is a true and correct copy of a document marked with bates numbers HOSPIRA\_00312433-434.

4. Attached as Exhibit C is a true and correct copy of a document marked with bates numbers HOSPIRA\_02501571-705.

5. Attached as Exhibit D is a true and correct copy of a document marked with bates number HOSPIRA\_02013595.

6. Attached as Exhibit E is a true and correct copy of a document marked with bates numbers FK-DEXMED 0196073-0196074.

7. Attached as Exhibit F is a true and correct copy of a document marked with bates numbers HOSPIRA\_00307943-946.

8. Attached as Exhibit G is a true and correct copy of a document marked with bates numbers HOSPIRA\_00307529-530.

9. Attached as Exhibit H is a true and correct copy of a document marked with bates numbers HOSPIRA\_00316414-422.

10. Attached as Exhibit I is a true and correct copy of a portion of a document titled Hospira's Final Response to Amended Invalidity Contentions.

11. Attached as Exhibit J is a true and correct copy of a document marked with bates number HOSPIRA\_02013594.

12. Attached as Exhibit K is a true and correct copy of a document marked with bates numbers HOSPIRA\_00903128-132.

13. Attached as Exhibit L is a true and correct copy of a document marked with bates numbers HOSPIRA\_00518710-729 and 00518803.

14. Attached as Exhibit M is a true and correct copy of a document marked with bates numbers HOSPIRA\_00511078-079.

15. Attached as Exhibit N is a true and correct copy of a document marked with bates number HOSPIRA\_02013590.

16. Attached as Exhibit O is a true and correct copy of a document marked with bates numbers FK-DEXMED0196871-872.

17. Attached as Exhibit P is a true and correct copy of a document marked with bates numbers FK-DEXMED0196688-693.

18. Attached as Exhibit Q is a true and correct copy of a document marked with bates numbers HOSPIRA\_02501827-837.

19. Attached as Exhibit R is a true and correct copy of a document marked with bates numbers HOSPIRA\_02501093-144, 167-74, and 555-56.

20. Attached as Exhibit S is a true and correct copy of a document marked with bates numbers FK-DEXMED0196391-96 and 0196424-25.

21. Attached as Exhibit T is a true and correct copy of a document marked with bates numbers HOSPIRA\_02501064-092.

22. Attached as Exhibit U is a true and correct copy of a document marked with bates numbers FK-DEXMED0196497-526.

23. Attached as Exhibit V is a true and correct copy of a document marked with bates numbers HOSPIRA\_01768591-600.

24. Attached as Exhibit W is a true and correct copy of a document marked with bates numbers HOSPIRA\_00356709-712.

25. Attached as Exhibit X is a true and correct copy of a document marked with bates numbers HOSPIRA\_00356713-721.

26. Attached as Exhibit Y is a true and correct copy of a document titled Hospira's Responses to Defendant Fresenius Kabi's Thirs Set of Interrogatories (Nos. 14-16).

27. Attached as Exhibit Z is a true and correct copy of a document marked with bates numbers FK-DEXMED0197105-120.

28. Attached as Exhibit AA is a true and correct copy of a document marked with bates numbers HOSPIRA\_02501708-805.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 8, 2018 in Chicago, IL.

*/s/ Tara Kurtis*

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Tara Kurtis