

SECTION IV-A

Hospira's Witness List

Hospira intends to call the following witnesses to testify at trial. The "Will Call" list represents a good faith statement of those witnesses Hospira presently intends to call live. The "May Call" list represents a good faith statement of those witnesses that Hospira may call live or by deposition designation.

Hospira reserves the right to call any additional witnesses necessitated by any of the Court's pretrial or trial rulings. Hospira also reserves the right to call, either live or by deposition: (a) additional witnesses to provide foundational testimony should any party contest the authenticity or admissibility of any material proffered at trial; (b) substitute witnesses for any identified witness whose employment or other relationship with Hospira changes such that he or she is no longer able, available or willing to testify on Hospira's behalf at trial; (c) any witnesses identified by Fresenius Kabi; (d) any witnesses required to rebut Fresenius Kabi's case; or (e) additional witnesses to respond to issues raised after the submission of this list.

I. Will Call – Witnesses Hospira Expects to Call Live at Trial

1. Priyanka Roychowdhury (co-inventor of Patents-in-Suit) (*only available July 16*)
2. Andrew Carter (expert witness in the field of economics who will testify regarding secondary considerations of non-obviousness)
3. Robert Linhardt (expert witness in the field of pharmaceutical formulation and development who will testify regarding validity)
4. Stephan Ogenstad (expert witness in the field of biostatistics who will testify regarding validity)
5. Michael Ramsay (expert witness in the field of clinical sedation and anesthesiology who will testify regarding validity)
6. R. Christopher Seaton (expert witness in the field of pharmaceutical commercial transactions who will testify regarding validity, specifically the transactions that are the subject of Fresenius Kabi's on-sale bar argument, including the business community's treatment of these transactions)

7. James J. White (expert in the field of the Uniform Commercial Code who will testify regarding validity, specifically the transactions that are the subject of Fresenius Kabi's on-sale bar argument, including the UCC's treatment of these transactions)

II. May Call – Witnesses Hospira May Call Live Or By Deposition Designation

1. Robert Cedergren (live) (co-inventor of patents-in-suit)
2. David Engels (live) (U.S. Sterile Injectables Portfolio Lead, Pfizer, Inc., who will testify regarding the commercial performance of Precedex Premix)
3. Rao Tata-Venkata (live) (Hospira research scientist involved in development of Hospira's ready-to-use dexmedetomidine product)
4. Lisa Zboril (live) (Hospira regulatory affairs team member for Hospira's dexmedetomidine products)
5. Eric Sheinin (live) (expert witness in the field of FDA regulatory process who will testify regarding validity, specifically the nature of the Investigational New Drug application that is a subject of Fresenius Kabi's on-sale bar argument)
6. Basma Ibrahim (deposition designation) (Fresenius Kabi principal scientist)
7. Shweta Mowli (deposition designation) (Fresenius Kabi project manager)