

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

TEVA PHARMACEUTICALS	)	
INTERNATIONAL GMBH and	)	
TEVA PHARMACEUTICALS USA, INC.	)	<b>FILED UNDER SEAL,</b>
	)	<b>LEAVE SOUGHT</b>
Plaintiffs,	)	<b>10/12/2021 (ECF NO. 180)</b>
	)	
v.	)	Case No. 1:18-cv-10242-ADB
	)	
ELI LILLY AND COMPANY	)	<b>HIGHLY CONFIDENTIAL –</b>
	)	<b>OUTSIDE COUNSEL ONLY</b>
Defendant.	)	

**DECLARATION OF STEPHEN H. INGHAM IN SUPPORT OF DEFENDANT ELI LILLY AND COMPANY’S MOTION TO EXCLUDE DR. GEOFFREY HALE AS AN EXPERT AND PREVENT DISCLOSURE OF PROTECTED INFORMATION**

**ENTIRE DECLARATION FILED UNDER SEAL PROVISIONALLY  
PURSUANT TO *DKT* 180**

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on this 12th day of October, 2021, in London, United Kingdom.

/s/Stephen H. Ingham  
Stephen H. Ingham

**CERTIFICATE OF SERVICE**

I, Andrea L. Martin, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on October 12, 2021. The unredacted version of this document will be served on all outside counsel of record via email.

/s/Andrea L. Martin, Esq.  
Andrea L. Martin, Esq.