IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

TEVA PHARMACEUTICALS INTERNATIONAL GMBH and TEVA PHARMACEUTICALS USA, INC.	)	[redacted]
Plaintiffs,	)	
v.	)	Case No. 1:18-cv-10242-ADB
ELI LILLY AND COMPANY	)	[redacted]
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

I, Stephen H. Ingham, declare as follows:

1. I am a Senior Director and Assistant General Patent Counsel at Eli Lilly and Company ("Lilly"). I am based in Bracknell, London, United Kingdom. I hold a Bachelor of Science degree in Biochemistry with Biotechnology from the University of St. Andrews, and a Master of Science degree in Management of Intellectual Property from the Queen Mary University of London. I additionally have earned a Diploma in European Patent Litigation from Université Robert Schuman (Strasbourg III) in Strasbourg, France. I am licensed as a United Kingdom Patent Attorney by the Chartered Institute of Patent Attorneys, and licensed as a European Patent Attorney by the European Patent Office. I have personal knowledge of the matters set forth herein, and if called upon would testify as follows.

2. Attached hereto as **Exhibit 1** is a true and correct copy of a document [redacted]

[redacted]

3. [redacted]

4. [redacted]

5. Attached hereto as **Exhibit 2** I believe to be a true and correct copy of [redacted]

6. Attached hereto as **Exhibit 3** I believe to be a true and correct copy of [redacted]

[redacted]

7. Attached hereto as **Exhibit 4** is a true and correct copy of European Patent No. 1,994,937 B1, entitled "Prevention and treatment of amyloidogenic disease," assigned on its face to Janssen Alzheimer Immunotherapy Limited.

8. [redacted]

Claims 1-3 of the European patent read as follows:

> 1. A pharmaceutical composition comprising an antibody to Aβ and a pharmaceutically acceptable non-toxic carrier or diluent, for use in preventing or treating a disease **characterized by** amyloid deposit in a patient, wherein the isotype of the antibody is human IgG1.
>
> 2. The pharmaceutical composition for use in preventing or treating a disease **characterized by** amyloid deposit in a patient of claim 1, wherein the antibody is a monoclonal antibody.
>
> 3. The pharmaceutical composition for use in preventing or treating a disease **characterized by** amyloid deposit in a patient of claim 1, wherein the antibody is a humanized antibody or a human antibody.

Ex. 4 at 30:50-57 (emphases in original).

9. [redacted]

10. [redacted]

11. Attached hereto as **Exhibit 5** is a true and correct redacted copy of [redacted]

12. [redacted] Lilly [redacted] opposition to EP1994937, which Lilly filed at the European Patent Office on September 27, 2011, and its UK revocation action, which Lilly filed on September 30, 2011. Attached hereto as **Exhibit 6** is a true and correct copy of Lilly's Notice of Opposition for European Patent No. 1,994,937, which I signed as an authorized representative of Lilly. Attached hereto as **Exhibit 7** is a true and correct copy of the minutes of oral proceedings before the European Patent Office held on June 10, 2013, which I attended on behalf of Lilly. Attached hereto as

Exhibit 8 is a true and correct copy of the as-filed Claim Form in the English Patents Court dated September 30, 2011, with a seal from the Court chambers dated October 12, 2011.

13. Attached hereto as **Exhibit 9** is a true and correct redacted copy of [redacted]

14. [redacted]

15. Attached hereto as **Exhibit 10** is a true and correct redacted copy of [redacted]

16. [redacted]

17. [redacted]

18. Attached hereto as **Exhibit 11,** is what I believe to be a true and correct copy of [redacted]

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