

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

TEVA PHARMACEUTICALS  
INTERNATIONAL GMBH and  
TEVA PHARMACEUTICALS  
USA, INC.,

Plaintiffs,

v.

ELI LILLY AND COMPANY,  
Defendant.

Civil Action No.  
1:18-cv-12029-ADB

**ATTORNEY DECLARATION OF ELAINE HERRMANN BLAIS IN SUPPORT OF  
PLAINTIFFS TEVA PHARMACEUTICALS INTERNATIONAL GMBH  
AND TEVA PHARMACEUTICALS USA, INC.'S OPPOSITION TO  
MOTION TO EXCLUDE DR. GEOFFREY HALE AS AN EXPERT**

I, Elaine Herrmann Blais, declare as follows:

1. I am a partner at Goodwin Procter LLP and counsel for Plaintiffs Teva Pharmaceuticals International GMBH and Teva Pharmaceuticals USA, Inc. (collectively, "Teva") in this matter. I am licensed to practice before all courts in the Commonwealth of Massachusetts, and this Court. I submit this Declaration in support of Teva's concurrently filed Opposition to Motion to Exclude Dr. Geoffrey Hale as an Expert. I have personal knowledge of the matters set forth herein, and if called upon would testify as follows.

2. Attached hereto as **Exhibit A** is a true and correct excerpt of an email from Natasha Daughtrey to Lilly Counsel, dated September 27, 2021.

3. Attached hereto as **Exhibit B** is a true and correct excerpt of an email from Ryan O'Quinn to Teva Counsel, dated October 14, 2021.

4. Attached hereto as **Exhibit C** is a true and correct excerpt of an email from Ryan O'Quinn to Teva Counsel, dated October 18, 2021.

5. Attached hereto as **Exhibit D** is a true and correct copy of email communication between Teva and Lilly Counsel, dated October 8, 2021.

6. Exhibits B–D to this declaration are subject to the Court’s order granting Plaintiffs’ Uncontested Motion for Leave to Impound Confidential Portions of Plaintiffs’ Opposition to Motion to Exclude Dr. Geoffrey Hale as an Expert and Exhibits (ECF Nos. 188, 189) and will be filed under seal.

7. Complete copies of any excerpted documents identified above will be provided to the Court upon request.

I declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge, and that I executed this declaration in Boston, Massachusetts on this 19<sup>th</sup> day of October, 2021.

Dated: October 19, 2021

Respectfully Submitted,

/s/ Elaine Herrmann Blais  
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**CERTIFICATE OF SERVICE**

I, Elaine Herrmann Blais, hereby certify that on October 22, 2021, a copy of the foregoing document was served on the following persons via email:

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