

**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

[REDACTED]

[REDACTED]

**DECLARATION OF DR. GEOFFREY HALE 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, Dr. Geoffrey Hale, declare as follows:

1. I am an expert in the field of antibody development, including the humanization of antibodies. My current posts include serving as a freelance scientist and consultant, the CEO of mAbsolve, and the managing director of Bioarchitech. All of my work relates to some extent to antibody development, including the humanization of antibodies.

2. Over the last 10 years as a freelance consultant, I have consulted on over 60 projects for approximately 45 different companies, most of which are pharmaceutical companies. All of this work related to antibody development, including the humanization of antibodies. This work has been my main source of earned income for the past 10 years. I have never been engaged by Lilly or any other client on terms which indefinitely limit my ability to act as a consultant for other companies, including in the area of humanization of antibodies.

3. I understand that the defendant, Eli Lilly and Company (“Lilly”), has objected to me serving as an expert for Teva in this case based on [REDACTED]. I understand Lilly has asserted that [REDACTED] and that the confidential information related to the issues in this case because they also pertained to [REDACTED]. I also understand Lilly has asserted that [REDACTED]. I also understand Lilly has asserted that a company, [REDACTED], was also involved in [REDACTED].

4. While I don’t have any reason to dispute that [REDACTED], I have no recollection of the content of [REDACTED]. As far as I can recall, [REDACTED]. I do not have any such documents in my possession.

5. Regarding the work done by [REDACTED], I have no specific recollection of what, if anything, [REDACTED]. Indeed, I would not have typically been involved in work that the company did. Instead, what would have typically occurred if I was engaged to work on a project where [REDACTED] was also engaged would be that I would be paid separately as a consultant to provide input on [REDACTED]. Those experiments would then be conducted by [REDACTED] without further input or supervision from me (my role with [REDACTED] at the relevant times was as a [REDACTED] and I did not have any executive responsibilities).

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 Oxford, United Kingdom on this 18<sup>th</sup> day of October, 2021.

Respectfully Submitted,



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Dr. Geoffrey Hale

**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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