

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

**UNOPPOSED MOTION TO EXTEND TIME TO DECEMBER 4, 2018 TO RESPOND
TO DEFENDANT’S COUNTERCLAIMS AND MOTION TO TRANSFER/STAY**

Plaintiffs Teva Pharmaceuticals International GmbH and Teva Pharmaceuticals USA, Inc. (collectively, “Plaintiffs”) hereby move this Court to extend—up to and including December 4, 2018—the time for Plaintiffs to file (1) their response to Defendant’s Counterclaims (D. 17, filed on November 2, 2018) and (2) their response to Defendant’s Motion to Transfer, Or If Not Transferred, Then To Stay This Litigation Pending *Inter Partes* Review (“Defendant’s Motion”) (D. 18, filed on November 2, 2018). These extensions will allow sufficient time for Plaintiffs and their counsel to complete the required investigation and review of the allegations to prepare their responses to Defendant’s Counterclaims and Defendant’s Motion. These extensions will not cause a material delay in this action. Defendant does not oppose this motion.

WHEREFORE, the Parties respectfully request allowance of this motion.

Dated: November 13, 2018

Respectfully submitted,

/s/ Douglas J. Kline

Douglas J. Kline (BBO# 556680)
Elaine Herrmann Blais (BBO# 656142)
Robert Frederickson, III (BBO# 670111)
Alexandra Lu (BBO# 676756)
Eric T. Romeo (BBO# 691591)
Martin C. Topol (BBO# 696020)
GOODWIN PROCTER LLP
100 Northern Avenue
Boston, MA 02210
Tel.: (617) 570-1000
Fax: (617) 523-1231
dkline@goodwinlaw.com
eblais@goodwinlaw.com
rfrederickson@goodwinlaw.com
alu@goodwinlaw.com
eromeo@goodwinlaw.com
mtopol@goodwinlaw.com

Neel Chatterjee (*pro hac vice* forthcoming)
GOODWIN PROCTER LLP
135 Commonwealth Drive
Menlo Park, CA 94025
Tel.: (650) 752-3100
Fax: (650) 853-1038
nchatterjee@goodwinlaw.com

Natasha E. Daughtrey
(*pro hac vice* forthcoming)
GOODWIN PROCTER LLP
601 S. Figueroa Street
Los Angeles, CA 90017
Tel.: (213) 426-2500
Fax: (213) 623-1673
ndaughtrey@goodwinlaw.com

Attorneys for Plaintiffs

LOCAL RULE 7.1(a)(2) CERTIFICATE

The undersigned certifies pursuant to Local rule 7.1(a)(2), that the moving party has conferred in good faith with opposing counsel on the matters set forth in the foregoing motion in an attempt to resolve or narrow the issues and reports that opposing counsel does not oppose the relief sought herein.

/s/ Douglas J. Kline

CERTIFICATE OF SERVICE

I, Douglas J. Kline, hereby certify that a copy of the foregoing document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies shall be served by first class mail postage prepaid on all counsel of record who are not served through the CM/ECF system on November 13, 2018.

/s/ Douglas J. Kline