

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. 18-12029-ADB

**PLAINTIFFS' ASSENTED-TO MOTION FOR
PRO HAC VICE ADMISSION OF I. NEEL CHATTERJEE AND NATASHA E.
DAUGHTREY**

Pursuant to Local Rule 83.5.3(b), Teva Pharmaceuticals International GmbH and Teva Pharmaceuticals USA, Inc. (collectively "Teva") by and through its undersigned counsel, hereby move for the admission *pro hac vice* of its counsel I. Neel Chatterjee and Natasha E. Daughtrey. As grounds, Teva states that:

1. I. Neel Chatterjee is a partner at the law firm of Goodwin Procter LLP, 601 Marshall Street, Redwood City, CA 94063. Attorney Chatterjee is a member in good standing of the Bar of the State of California. He has also been admitted to practice in the United States District Courts for the Northern, Central, and Southern Districts of California, the Eastern District of Texas, the District of Colorado, and the United States Courts of Appeals for the First, Ninth, and Federal Circuits.

2. In further support of its motion, Teva submits as **Exhibit A** the Certificate of I. Neel Chatterjee which establishes that he is a member in good standing of the Bar in every jurisdiction in which he has been admitted to practice; that there are no disciplinary proceedings

against him in any jurisdiction; that he has not previously had a *pro hac vice* admission to this Court or any other court revoked for misconduct; and that he is familiar with the Local Rules of this Court.

3. Natasha E. Daughtrey is a partner at the law firm of Goodwin Procter LLP, 601 S. Figueroa Street, 41st Floor, Los Angeles, CA 90017-5704. Attorney Daughtrey is a member in good standing of the Bar of the States of California and New York. She has also been admitted to practice in the United States District Courts for the Northern and Central Districts of California, the Eastern and Southern Districts of New York, and the United States Court of Appeals for the Federal Circuit.

4. In further support of its motion, Teva submits as **Exhibit B** the Certificate of Natasha E. Daughtrey which establishes that she is a member in good standing of the Bar in every jurisdiction in which she has been admitted to practice; that there are no disciplinary proceedings against her in any jurisdiction; that she has not previously had a *pro hac vice* admission to this Court or any other court revoked for misconduct; and that she is familiar with the Local Rules of this Court.

5. Defendant does not object to the filing of this Motion.

WHEREFORE, this Court should grant the admission of attorneys I. Neel Chatterjee and Natasha E. Daughtrey *pro hac vice* to the Bar of this Court.

Dated: November 20, 2018

Respectfully submitted,

/s/ Robert Frederickson III

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LOCAL RULE 7.1 CERTIFICATION

I hereby certify pursuant to Local Rule 7.1(a)(2) that counsel for Teva conferred with opposing counsel regarding the relief requested herein and opposing counsel assents to this motion.

/s/ Robert Frederickson III

CERTIFICATE OF SERVICE

I, Robert Frederickson III, 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 20, 2018.

/s/ Robert Frederickson III