

**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

DECLARATION OF DR. K. CHRISTOPHER GARCIA

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1. I, Kenan Christopher Garcia, hereby declare as follows:

2. I am a Professor at the Stanford University School of Medicine in the Department of Molecular and Cellular Physiology, and the Department of Structural Biology.

3. I have been retained by counsel for Defendant Eli Lilly and Company (“Lilly”) in this case to offer opinions as to the scope and meaning that would have been given to certain terms that appear in the asserted claims of U.S. Patent Nos. 8,586,045 (Ex. 1, “the ’045 Patent”); 8,597,649 (Ex. 2, “the ’649 Patent”); 9,266,951 (Ex. 3, “the ’951 Patent”); 9,340,614 (Ex. 4, “the ’614 Patent”); 9,346,881 (Ex. 5, “the ’881 Patent”); 9,884,907 (Ex. 6, “the ’907 Patent”); 9,884,908 (Ex. 7, “the ’908 Patent”); 9,890,210 (Ex., 8, “the ’210 Patent”); and 9,890,211 (Ex. 9, “the ’211 Patent”) (collectively, the Patents-in-Suit) by a person having ordinary skill in the art at the time of the alleged inventions.¹

I. EDUCATION AND EXPERIENCE

4. I am currently a Professor at the Stanford University School of Medicine. I am also an Investigator of the Howard Hughes Medical Institute in Stanford, California. Since 1999, my laboratory at Stanford has focused on the biophysical characterization of protein structure and function, including protein engineering, antibody recognition and engineering, therapeutic antibodies, and receptor-ligand signaling. I have authored over 200 publications on subjects such as antibody-antigen interactions, protein engineering, immunology, and structural and molecular modeling.

¹ I understand that Teva Pharmaceuticals International GmbH and Teva Pharmaceuticals USA, Inc. (collectively, “Teva”) asserted the following claims against Lilly: claims 1, 3, 4, 8, 9, 12, 15-17, 19, 20, 24, 27, 30, and 31 of the ’045 patent; claims 7 and 9 of the ’649 patent; claims 17 and 18 of the ’951 patent; claims 18 and 19 of the ’614 patent; claims 17 and 19 of the ’881 patent; claims 1, 4-7, 15, and 17 of the ’907 patent; claims 1, 4-7, 15, and 17 of the ’908 patent; claims 11 and 13 of the ’210 patent; and claims 2, 12, and 14 of the ’211 patent.

5. I received my B.S. in Biochemistry from Tulane University in 1984 and my Ph.D. in Biophysics from Johns Hopkins University in 1992, studying antibody structure, anti-peptide and anti-hormone antibody recognition, and molecular immunology. I completed my first post-doctoral fellowship in the Departments of Protein Engineering and Molecular Biology at Genentech. My research was focused on recombinant protein expression, protein, peptide and antibody engineering, as well as protein structure and activity. I completed my second post-doctoral fellowship at the Scripps Research Institute. My research was focused on immunology, including the relationship between antibodies and antigens, the molecules to which antibodies bind.

6. I was elected to the National Academy of Sciences, and the National Academy of Medicine, and have received several awards and recognition in my field, including from the American Heart Association and the Cancer Research Institute. I was named a Keck Distinguished Medical Scholar and a Pew Scholar. I am on the Scientific Advisory Board of Harvard Medical School's Program in Cellular and Molecular Medicine. I have co-founded or served on Scientific Advisory Boards of several biotech companies working in the area of immunology.

7. I serve on the editorial boards of several scientific journals, including Proceedings of the National Academy of Sciences of the United States of America, Immunological Reviews, Immunity, and Structure.

8. For the past twenty years, I have taught courses in the fields of molecular biology, immunology, structural biology, microbiology, and molecular and cellular physiology.

9. My *curriculum vitae* is attached as Appendix A, which includes a detailed list of publications.

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