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Attorneys for Defendant Sagent Pharmaceuticals, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

BAXTER HEALTHCARE CORPORATION, BAXTER
INTERNATIONAL INC., and BAXTER HEALTHCARE
S.A.,

Plaintiffs,

v.

HQ SPECIALTY PHARMA CORPORATION,
WELGRACE RESEARCH GROUP, ESTATE OF
GEORGE OWOO, and JANET FENNING-OWOO, in
her capacity as INDEPENDENT ADMINISTRATOR OF
THE ESTATE OF GEORGE OWOO and as VICE
PRESIDENT OF WELGRACE RESEARCH GROUP,

Defendants.

Docket No.:
1:13-cv-6228-JBS-KMW

BAXTER HEALTHCARE CORPORATION, BAXTER
INTERNATIONAL INC., and BAXTER HEALTHCARE
S.A.,

Plaintiffs,

v.

Docket No.:
1:14-cv-07094-JBS-JS

AGILA SPECIALTIES PRIVATE LIMITED and AGILA
SPECIALTIES INC. f/k/a STRIDES INC.,

Defendants.

BAXTER HEALTHCARE CORPORATION, BAXTER
INTERNATIONAL INC., and BAXTER HEALTHCARE
S.A.,

Plaintiffs,

v.

SAGENT PHARMACEUTICALS, INC.,
Defendant.

Docket No.:
1:15-cv-01684-JBS-JS

**NOTICE OF MOTION TO CONSOLIDATE PURSUANT TO FEDERAL RULE OF
CIVIL PROCEDURE 42 AND LOCAL CIVIL RULE 42.1**

To: Robert D. Rhoad
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PLEASE TAKE NOTICE that on July 6, 2015, at 9:00 a.m. or as soon thereafter as
counsel may be heard, pursuant to L.Civ.R. 101.1(c), the undersigned attorneys for Defendants
Agila Specialties Private Limited and Agila Specialties Inc. as well as Defendants Sagent
Pharmaceuticals, Inc. (collectively “Defendants”), shall move pursuant to Fed. R. Civ. Pro. 42

and D.N.J. Local Civil Rule 42.1 before the United States District Court, District of New Jersey, Cohen United States Courthouse, 1 John F. Gerry Plaza, 4th and Cooper Streets, Camden, New Jersey, for entry of an Order consolidating Defendants' matters with *Baxter Healthcare Corp. et al. v. HQ Specialty Pharma et al.*, Case No. 13-cv-06228 (D.N.J.) for purposes of claim construction and trial. Please note that Defendants have requested an expedited return date on the motion which, if granted by the Court, will modify the return date stated above.

PLEASE TAKE FURTHER NOTICE that in support of the motion, the Defendants shall rely on the accompanying legal brief.

A proposed form of Order submitted for the Court's convenience.

/s/ John Michael Vazquez
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Dated: May 27, 2015