

February 26, 2016

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VIA E-MAIL

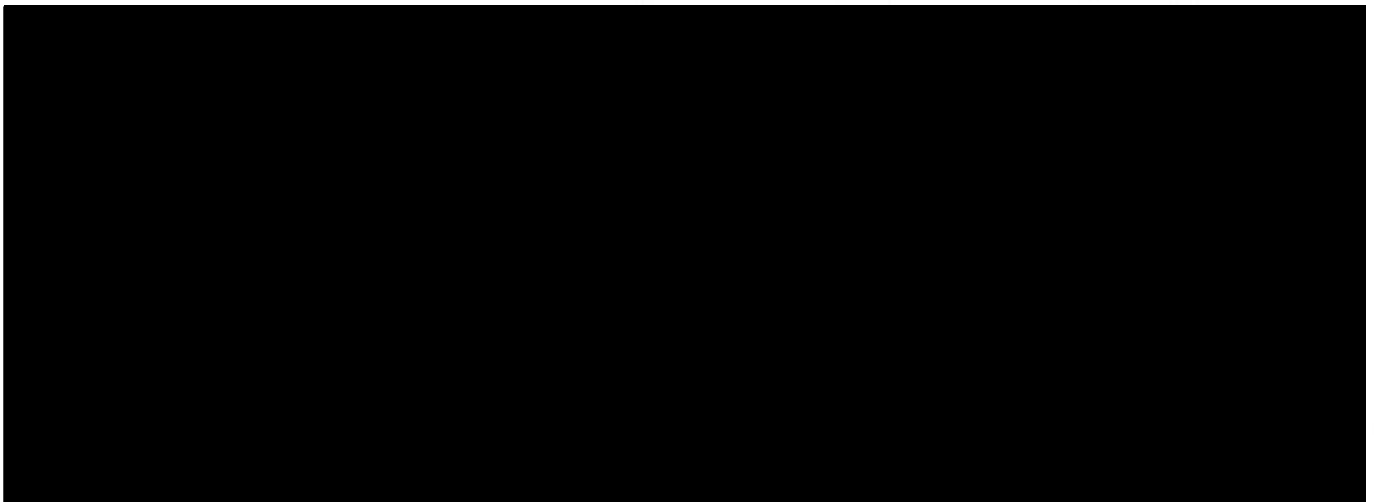
John T. Bennett
Goodwin Procter LLP
Exchange Place
Boston, MA 02109

Re: *In re Copaxone 40 mg Consolidated Cases*, C.A. No. 14-1171-GMS (Consolidated)

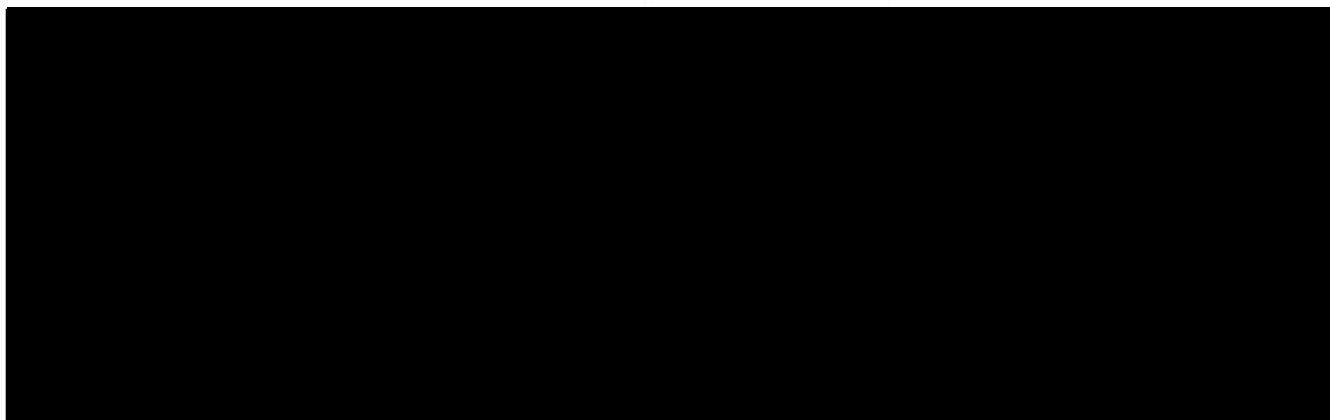
Dear John:

I write regarding several discovery issues.

First, Plaintiffs appear to have marked the entire deposition transcripts of Irit Pinchasi and a third-party witness, Dr. Jerry Wolinsky, as outside counsel eyes only under the protective order. However, plaintiffs have no genuine basis for making such a sweeping confidentiality designation under the protective order. At a minimum, the following sections should not be designated confidential under the protective order, either Highly Confidential or Outside Counsel Only: 2/15/2016 Wolinsky Dep. Tr. at 12:10-13:7, 35:15-38:25, 42:6-44:6, 64:22-65:13, 68:3-16, 69:14-25, 167:20-171:11, 222:13-224:14, and 237:17-238:5; 2/11/2016 Pinchasi Dep. Tr. at 12:18-13:3, 15:2-19:24, and 152:5-153:16. Please confirm that these sections are not Highly Confidential or Outside Counsel Only by Tuesday, March 1, 2016. More broadly, please also provide appropriately limited confidentiality designations—if any—for the Pinchasi and Wolinsky deposition transcripts.



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Sincerely,

A handwritten signature in blue ink, appearing to read 'DLA', is written over the word 'Sincerely,'.

David L. Anstaett

DLA:krd