

Transcript of the Testimony of **M. Jayne Lawrence**

Date: February 29, 2016

Case: Senju Pharmaceutical Co., LTD., et al. v. Lupin, LTD., and Lupin
Pharmaceutical, Inc.,



Ace-Federal Reporters, Inc.
Phone: 202-347-3700
Fax: 202-737-3638
Email: info@acefederal.com
Internet: www.acefederal.com

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

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SENJU PHARMACEUTICAL CO., LTD.,
BAUSCH & LOMB INCORPORATED, and
BAUSCH & LOMB PHARMA HOLDINGS CORP.,
Plaintiffs, C.A. Nos.
1:14-cv-00667-JBS-KMW
v. 1:14-cv-04149-JBS-KMW
LUPIN, LTD. and LUPIN 1:14-cv-05144-JBS-KMW
PHARMACEUTICALS, INC., 1:14-cv-00335-JBS-KMW
Defendants.
INNOPHARMA LICENSING, 1:14-cv-06893-JBS-KMW
INC., INNOPHARMA LICENSING, 1:14-cv-03240-JBS-KMW
LLC, INNOPHARMA, INC.,
INNOPHARMA, LLC,
Defendants.

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VIDEOTAPED DEPOSITION of M. JAYNE LAWRENCE, Ph.D.
February 29, 2016
9:06 a.m.

Goodwin Procter, LLP
53 State Street
Boston, Massachusetts

Reporter: Michael D. O'Connor, RMR, CRR, CBC, CCP

Page 2

1 VIDEOTAPED DEPOSITION of M. JAYNE
 2 LAWRENCE, Ph.D., taken pursuant to Notice, held
 3 at the Law Offices of Goodwin Procter, LLP, 53
 4 State Street, Boston, Massachusetts, on Monday,
 5 February 29, 2016, at 9:06 a.m., before Michael
 6 D. O'Connor, RMR, CRR, CBC, CCP, and a Notary
 7 Public.
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Page 4

1 APPEARANCES (Cont'd):
 2
 3 ATTORNEYS FOR INNOPHARMA DEFENDANTS:
 4 ALSTON & BIRD, LLP
 5 4721 Emperor Boulevard, Suite 400
 6 Durham, North Carolina 27703
 7 (919) 862-2200
 8 BY: JITENDRA MALIK, Ph.D.
 9 jitty.malik@alston.com
 10
 11 Also Present: Shawn Budd, Videographer
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 15
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 21
 22

Page 3

1 APPEARANCES:
 2
 3 ATTORNEYS FOR PLAINTIFFS:
 4 FINNEGAN, HENDERSON, FARABOW, GARRETT &
 5 DUNNER, LLP
 6 901 New York Avenue, N.W.
 7 Washington, D.C. 20001
 8 (202) 408-4000
 9 BY: JUSTIN J. HASFORD, ESQ.
 10 BY: TERRENCE KIM, ESQ.
 11 justin.hasford@finnegan.com
 12 terrence.kim@finnegan.com
 13
 14 ATTORNEYS FOR LUPIN LTD. AND LUPIN
 15 PHARMACEUTICALS, INC.:
 16 GOODWIN PROCTER, LLP
 17 The New York Times Building
 18 620 Eighth Avenue
 19 New York, New York 10018
 20 (212) 459-7236
 21 BY: DANIEL P. MARGOLIS, Ph.D.
 22 dmargolis@goodwinprocter.com

Page 5

1 INDEX
 2 Deposition of: Direct Cross Redirect Recross
 3 M. JAYNE LAWRENCE, Ph.D.
 4 By Mr. Hasford 11
 5
 6 EXHIBITS
 7 No. Page
 8 Exhibit 25 Deposition transcript of M.
 9 Jayne Lawrence, Ph.D., dated
 10 9/4/14 12
 11 Exhibit 26 Deposition transcript of M.
 12 Jayne Lawrence, Ph.D., dated
 13 2/16/16 14
 14 Exhibit 27 Document entitled "Opening
 15 Expert Report of M. Jayne
 16 Lawrence, Ph.D." 16
 17 Exhibit 28 U.S. Patent No. 8,129,431 45
 18 Exhibit 29 U.S. Patent No. 8,669,290 45
 19 Exhibit 30 U.S. Patent No. 8,754,131 46
 20 Exhibit 31 U.S. Patent No. 8,871,813 47
 21 Exhibit 32 U.S. Patent No. 8,927,606 48
 22

Page 6			Page 8		
1	EXHIBITS (Cont'd)		1	EXHIBITS (Cont'd)	
2	No.	Page	2	No.	Page
3	Exhibit 33	FDA-approved package insert	3	Exhibit 49	Ghio reference , entitled,
4		for Alphagan P, entitled,	4		"Tyloxapol Inhibits NF-kB and
5		"Center for Drug Evaluation	5		Cytokine Release, Scavenges
6		and Research" 78	6		HOCl, and Reduces Viscosity
7	Exhibit 34	U.S. Patent No. 4,910,225 89	7		of Cystic Fibrosis Sputum" 204
8	Exhibit 35	Fu reference EP 0306984A1 95	8	Exhibit 50	Remington document entitled,
9	Exhibit 36	U.S. Patent No. 5,603,929 101	9		"Remington, The science and
10	Exhibit 37	U.S. Patent No. 5,558,876 106	10		Proctice of Pharmacy, 22nd
11	Exhibit 38	U.S. Patent No. 5,891,913 107	11		Edition" 209
12	Exhibit 39	Document entitled "Responsive	12	Exhibit 51	Edwards and Prausnitz
13		Expert Report of M. Jayne	13		reference, entitled "Predicted
14		Lawrence Ph.D. Regarding	14		Permeability of Cornea to
15		Secondary Considerations" 135	15		Topical Drugs" 222
16	Exhibit 40	U.S. Patent No. 9,144,609 148	16		
17	Exhibit 41	Document entitled, "Reply	17	Exhibit 52	Schick reference, entitled
18		Expert Report of M. Jayne	18		"Nonionic Surfactants" 229
19		Lawrence Ph.D. Regarding	19		
20		Invalidity" 150	20		
21			21		
22			22		

Page 7			Page 9		
1	EXHIBITS (Cont'd)		1	EXHIBITS (Cont'd)	
2	No.	Page	2	No.	Page
3	Exhibit 42	DeRuiter reference, entitled,	3	Exhibit 53	Redenti reference, entitled
4		"Non-Steroidal Antiinflammatory	4		"Cyclodextrin Complexes of
5		Drugs (NSADs)" 167	5		Salts of Acidic Drugs,
6	Exhibit 43	U.S. Patent No. 5,475,034 175	6		Thermodynamic Properties,
7	Exhibit 44	Eyjolfsson reference, entitled,	7		Structural Features, and
8		"Diclofenac Sodium: Oxidative	8		Pharmaceutical Applications" 234
9		Degradation in Solution and	9		
10		Solid State" 179	10		
11			11		
12	Exhibit 45	Gu reference, entitled, "Light	12		
13		Degradation of Ketorolac	13		
14		Tromethamine" 181	14		
15	Exhibit 46	U.S. Patent No. 6,165,445 183	15		
16	Exhibit 47	Handbook of Pharmaceutical	16		
17		Excipients, Third Edition 192	17		
18	Exhibit 48	Document entitled, "Remington:	18		
19		The Science and Practice of	19		
20		Pharmacy" 200	20		
21			21		
22			22		

Page 10	Page 12
<p>1 PROCEEDINGS</p> <p>2 VIDEOGRAPHER: We are on the record.</p> <p>3 This is the videographer speaking, Shawn Budd,</p> <p>4 with Ace Federal Reporters. Today's date is</p> <p>5 February 29, 2016, and the time is 9:06 a.m.</p> <p>6 We are here in Boston, Massachusetts</p> <p>7 to take the video deposition of Dr. Jayne</p> <p>8 Lawrence in the matter of Senju Pharmaceutical</p> <p>9 Company, et al. versus Lupin Limited and Lupin</p> <p>10 Pharmaceuticals, Inc.</p> <p>11 Would counsel please introduce</p> <p>12 themselves.</p> <p>13 MR. HASFORD: Justin Hasford from</p> <p>14 Finnegan on behalf of the Plaintiffs. With me</p> <p>15 here is my colleague, Terrence Kim.</p> <p>16 MR. MARGOLIS: Dan Margolis from</p> <p>17 Goodwin Procter for Lupin.</p> <p>18 MR. MALIK: Jitendra Malik, law firm</p> <p>19 of Alston & Bird, for the Innopharma Defendants.</p> <p>20 VIDEOGRAPHER: Would the court</p> <p>21 reporter please swear in the witness.</p> <p>22 M. JAYNE LAWRENCE, Ph.D.</p>	<p>1 understand a question that I ask, please let me</p> <p>2 know. If you answer a question, I will assume</p> <p>3 that you understood the question.</p> <p>4 Is that okay?</p> <p>5 A. Yes.</p> <p>6 Q. Is there any reason why you cannot</p> <p>7 testify truthfully and accurately today?</p> <p>8 A. No.</p> <p>9 MR. MALIK: Counsel, not to</p> <p>10 interrupt, but our stipulation, an objection by</p> <p>11 one Defendant is an objection to all?</p> <p>12 MR. HASFORD: So stipulated.</p> <p>13 I'm handing the court reporter what</p> <p>14 I've asked to be marked as Lawrence Exhibit 25.</p> <p>15 For the record, Lawrence Exhibit 25 is a copy of</p> <p>16 the transcript of the testimony of M. Jayne</p> <p>17 Lawrence, dated September 4, 2015 in this case.</p> <p>18 (Document marked as Exhibit 25</p> <p>19 for identification)</p> <p>20 Q. Are you the M. Jayne Lawrence who</p> <p>21 provided sworn testimony in this case on</p> <p>22 September 4, 2015 that was transcribed in</p>
Page 11	Page 13
<p>1 having been satisfactorily identified by the</p> <p>2 production of her driver's license, and duly</p> <p>3 sworn by the Notary Public, was examined and</p> <p>4 testified as follows:</p> <p>5 DIRECT EXAMINATION</p> <p>6 BY MR. HASFORD:</p> <p>7 Q. Good morning, Dr. Lawrence.</p> <p>8 A. Good morning.</p> <p>9 Q. Would you please state your name and</p> <p>10 address for the record.</p> <p>11 A. Yes. It's Margaret Jayne Lawrence,</p> <p>12 62 Wellington Road, Ashford, Middlesex, U.K.</p> <p>13 Q. Let me tell you how today's</p> <p>14 deposition will proceed. I represent the</p> <p>15 Plaintiffs in this case. Today I will ask you a</p> <p>16 series of questions, and I would ask that you</p> <p>17 answer my questions truthfully and accurately.</p> <p>18 If you need a break, just let me</p> <p>19 know, but if I have asked a question, I would ask</p> <p>20 that you please first answer the question and</p> <p>21 then we can take a break.</p> <p>22 If for any reason you do not</p>	<p>1 Lawrence Exhibit 25?</p> <p>2 A. I am.</p> <p>3 Q. Turn, if you would, to Page 17 in the</p> <p>4 small numbered pages. It's going to be Page 5 in</p> <p>5 the large numbered pages. Let me direct your</p> <p>6 attention to Page 17, Line 13.</p> <p>7 I asked you a question, "Let me tell</p> <p>8 you how today's deposition will proceed. I</p> <p>9 represent the Plaintiff in this case. Today I</p> <p>10 will ask you a series of questions, and I would</p> <p>11 ask that you answer my questions truthfully and</p> <p>12 accurately.</p> <p>13 "If you need a break, just let me</p> <p>14 know, but if I have asked a question I would ask</p> <p>15 that you first answer the question and then we</p> <p>16 can take a break.</p> <p>17 "If for any reason you do not</p> <p>18 understand a question that I ask, please let me</p> <p>19 know. If you answer a question, I will assume</p> <p>20 that you understood the question. Is that okay?"</p> <p>21 You answered "Yes." Then I asked a question, "Is</p> <p>22 there any reason why you cannot testify</p>

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