

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.,



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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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1 APPEARANCES (Cont'd):
 2
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 11 Also Present: Shawn Budd, Videographer
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Page 3

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Page 10	<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>	Page 12	<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	<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>	Page 13	<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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