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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

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HELSINN HEALTHCARE, S.A. and  
ROCHE PALO ALTO, LLC,

Plaintiffs,

-vs-

DR. REDDY'S LABORATORIES, LTD.,  
DR. REDDY'S LABORATORIES, INC.,  
TEVA PHARMACEUTICALS USA, INC.,  
and TEVA PHARMACEUTICAL  
INDUSTRIES, LTD.

Defendants.

CIVIL ACTION NUMBER:

11-3962

TRIAL

\_\_\_\_\_  
Clarkson S. Fisher United States Courthouse  
402 East State Street  
Trenton, New Jersey 08608  
June 16, 2015

**B E F O R E:**

THE HONORABLE MARY L. COOPER  
UNITED STATES DISTRICT JUDGE

Certified as True and Correct as required by Title 28, U.S.C.,  
Section 753

/S/ Regina A. Berenato-Tell, CCR, CRR, RMR, RPR  
/S/ Carol Farrell, CCR, CRR, RMR, CCP, RPR, RSA

Dr. Reddy's Laboratories, Ltd., et al.  
v.  
Helsinn Healthcare S.A. et al.

1 UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF NEW JERSEY

3 \_\_\_\_\_  
4 HELSINN HEALTHCARE, S.A. and  
5 ROCHE PALO ALTO, LLC,

6 Plaintiffs,

7 -vs-

8 DR. REDDY'S LABORATORIES, LTD.,  
9 DR. REDDY'S LABORATORIES, INC.,  
10 TEVA PHARMACEUTICALS USA, INC.,  
11 and TEVA PHARMACEUTICAL  
12 INDUSTRIES, LTD.

13 Defendants.

14 \_\_\_\_\_  
15 Clarkson S. Fisher United States Courthouse  
16 402 East State Street  
17 Trenton, New Jersey 08608  
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A P P E A R A N C E S:

PAUL HASTINGS

BY: JOSEPH O'MALLEY, ESQUIRE  
ERIC W. DITTMANN, ESQUIRE  
ISAAC S. ASHKENAZI, ESQUIRE

SAUL EWING

BY: CHARLES M. LIZZA, ESQUIRE  
Attorneys for the Plaintiffs

BUDD LARNER

BY: STUART D. SENDER, ESQUIRE  
MICHAEL H. IMBACUAN, ESQUIRE  
HUA HOWARD WANG, ESQUIRE  
CONSTANCE S. HUTTNER, ESQUIRE  
KENNETH E. CROWELL, ESQUIRE

Attorneys for the Defendant, Dr. Reddy's Laboratories

WINSTON & STRAWN

BY: JOVIAL WONG, ESQUIRE  
GEORGE LOMBARDI, ESQUIRE  
JULIA MANO JOHNSON, ESQUIRE  
BRENDAN F. BARKER, ESQUIRE  
LITE DePALMA, GREENBERG, LLC  
BY: MAYRA V. TARANTINO, ESQUIRE  
Attorneys for the Defendant, Teva

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I N D E X

WITNESS                      DIRECT                      CROSS                      REDIRECT                      RE CROSS

GORDON L. AMIDON  
By Mr. Dittmann  
By Mr. Lombardi  
(Videotape Deposition of Patrick DeLuca)

1 A. Yes.

2 Q. And we know, we know today that when you use the EDTA, it  
3 does improve stability; is that right?

4 A. Well, I believe that the EDTA -- what EDTA is doing in  
5 the formula is -- is unknown, but it does appear to improve  
6 the stability.

7 Q. Okay. All right. And just let's look at Amidon  
8 Demonstrative Number 3. I'm going back to that Wells article  
9 or chapter that you and I talked about earlier this morning,  
10 Doctor.

11 A. Uh-huh.

12 Q. And this is another table from Wells, which is in the  
13 prior art for purposes of this case, and it says at the top  
14 "Simple strategies for improving drug stability." And it  
15 says, for one of them of the degradation processes talks about  
16 is oxidation, and one of four that it mentions is the strategy  
17 is to chelate metal ions, and it specifically calls out EDTA;  
18 is that right?

19 A. Uh-huh, yes. There's several approaches, but that's one  
20 of them.

21 Q. And then for demonstrative -- well, and this is something  
22 that you see throughout the literature is reference to EDTA's  
23 use if there's some metal ion effect; isn't that right?

24 A. That's one of the uses of EDTA, yes.

25 Q. Okay. That's a common use.

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