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

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

7 Plaintiffs,

8 -vs-

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

14 Defendants.

15 _____
16 Clarkson S. Fisher United States Courthouse
17 402 East State Street
18 Trenton, New Jersey 08608
19 June 16, 2015

20 **B E F O R E:**

21 THE HONORABLE MARY L. COOPER
22 UNITED STATES DISTRICT JUDGE

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

25 /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.

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6 ROCHE PALO ALTO, LLC,

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I N D E X

WITNESS DIRECT CROSS REDIRECT RECROSS

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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