

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

PFIZER INC. and UCB PHARMA GMBH
Plaintiffs

vs.
C.V. No. 13-1110 (GMS)

ALKEM LABORATORIES LTD., CONSOLIDATED
Et al.
Defendants.

CONFIDENTIAL ATTORNEYS EYES ONLY
Videotaped Deposition of Claus Meese
Vol 1

Taken at the offices of:
McDermott Will & Emery
Avenue des Nerviens 9-31
1040 Brussels

Tuesday, 20th January 2015
At 9.49 a.m.

Henderson Legal Services, Inc.

202 220 4158

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1 PT 01932091?

2 A. Yes.

3 Q. Do you recognize the handwriting on
4 this document?

5 A. Yes.

6 Q. Is that your handwriting?

7 A. Yes, it is.

8 Q. And in this you are referring in
9 this handwritten section, you are referring to SPM
10 8228, the statement that X is chloride; is that
11 correct?

12 A. Yes.

13 Q. Does that mean that this was the
14 hydrochloride salt that you were looking at?

15 A. Yes.

16 Q. And you state that this salt is
17 amorphous and hysteresis; is that correct?

18 A. It is not precise. Once a salt is
19 formed it is highly crystalline, but if it is
20 exposed to moisture, traces of water, it is
21 hysteresis, yes. Let me say it gives a syrup.

22 Q. And so you proposed looking at
23 roughly 20 other salts to improve the
24 physiochemical properties; is that correct?

25 A. Yes.

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1 Q. And did you have specific salts in
2 mind already when you made this proposal?

3 A. No, not yet. That was on top of our
4 salt screening programme at that time.

5 Q. Were you involved in the salt
6 screening programme?

7 A. Yes.

8 Q. What was your role?

9 A. First of all I gave the co-workers
10 the description for the initial experiments on a
11 lab scale such as solvent concentrations, solvent
12 mixtures in order to get precipitations matching
13 time and temperatures.

14 Q. Anything else?

15 A. I involved a number of external
16 CROs, among them the University of Wuppertal,
17 Germany, and we needed simply manpower because
18 it's laborious to make all those experiments.

19 Q. Anything else?

20 A. And there was a brief involvement of
21 the University of Groningen in the Netherlands,
22 Holland. That is also in order to make some
23 experiments. And I told them which acids should
24 be tested first, so the necessities or which assay
25 should be used and with what are the solvents, and

1 some of the reaction conditions also were given to
2 the partners. They started the work for us.

3 Q. And which acids did you think should
4 be tested first?

5 A. A large variety of inorganic acids,
6 but also organic acids such as citric acid or
7 tartaric risk acid, of course mendelic acid. And
8 I remember I have to look at more than 100 acids.

9 Q. Right. I am going to hand you a
10 document that will be marked as Meese Exhibit 30,
11 bearing Bates numbers PT 01718486 through PT
12 01718498.

13 (Exhibit 30 marked for identification)

14 A. Thank you.

15 Q. Dr Meese, do you understand these to
16 be the minutes of the CMC sub team taken on
17 October 8th, 1999?

18 A. Umm hmm.

19 Q. And did you attend this meeting?

20 A. Yes, I did.

21 Q. What does CMC sub team mean?

22 A. That means that the project was
23 pretty far developed and this sub team takes care
24 primarily of chemistry. Yes, it seems CMC is
25 clear.