

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

MEDA PHARMACEUTICALS, INC., )  
 and CIPLA, LTD., )  
 )  
 Plaintiffs, )  
 ) Civil Action No.  
 vs. ) 1:15-cv-785  
 )  
 APOTEX, INC., )  
 )  
 Defendant. )  
 \_\_\_\_\_ )

Videotaped deposition of DR. MAUREEN DONOVAN, taken in the above-captioned cause, at Winston & Strawn, 35 West Wacker Drive, Chicago, Illinois, before Rachel F. Gard, CSR, RPR, CLR, CRR, commencing at the hour of 9:06 a.m. on Friday, October 7, 2016.

---

DIGITAL EVIDENCE GROUP  
 1730 M Street, NW, Suite 812  
 Washington, D.C. 20036  
 (202) 232-0646

1 APPEARANCES:

2 ON BEHALF OF THE PLAINTIFFS:

3 STERNE KESSLER GOLDSTEIN & FOX

4 BY: MS. UMA N. EVERETT

5 MR. RAMI BARDENSTEIN

1100 New York Avenue, NW

6 Washington, DC 20005

202.371.2600

7 ueverett@skgf.com

rbardenstein@skgf.com

8

9 ON BEHALF OF THE DEFENDANT:

10 WINSTON & STRAWN, LLP

BY: MR. KEVIN E. WARNER

11 35 West Wacker Drive

Chicago, Illinois 60601

12 312.558.5852

kwarner@winston.com

13

14

15

16 ALSO PRESENT:

17 Kimberly Ortiz (Videographer)

18

19

20

21

22

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22

## I N D E X

| WITNESS                    | PAGE |
|----------------------------|------|
| DR. MAUREEN DONOVAN        |      |
| Examination by Ms. Everett | 6    |
| Examination by Mr. Warner  | 280  |

## E X H I B I T S

| DEPOSITION EXHIBITS | PAGE   |     |
|---------------------|--|-----|
| Exhibit 1           | Expert Report of Maureen Donovan, Ph.D.                          | 38  |
| Exhibit 2           | Expert Rebuttal Report of Maureen D. Donovan, Ph.D.              | 39  |
| Exhibit 3           | Expert Reply Report of Maureen D. Donovan, Ph.D.                 | 39  |
| Exhibit 4           | Imitrex label  | 96  |
| Exhibit 5           | Loyd Allen article   | 108 |
| Exhibit 6           | '194 patent  | 131 |
| Exhibit 7           | Report of Matthew Herpin, Ph.D.                                  | 173 |
| Exhibit 8           | Cramer reference   | 176 |
| Exhibit 9           | Exhibit R, Pump Delivery Shot Weight Raw Data Sprayability Check | 185 |

| E X H I B I T S (Continued) |                     |                            |
|-----------------------------|---------------------|----------------------------|
|                             | DEPOSITION EXHIBITS | PAGE                       |
| 1                           |                     |                            |
| 2                           |                     |                            |
| 3                           | Exhibit 10          | Expert Report of 203       |
| 4                           |                     | Ramprakash Govindarajan    |
| 5                           |                     | Ph.D.                      |
| 6                           | Exhibit 11          | Exhibit C, Cramer 209      |
| 7                           |                     | Example I                  |
| 8                           | Exhibit 12          | Exhibit D, Dr. 209         |
| 9                           |                     | Govindarajan Process       |
| 10                          | Exhibit 13          | PH reports for 209         |
| 11                          |                     | Dr. Herpin's tests         |
| 12                          | Exhibit 14          | Feasibility assessment 222 |
| 13                          |                     | plan                       |
| 14                          | Exhibit 15          | Lab notebook 242           |
| 15                          | Exhibit 16          | Chapter of Remington's 265 |
| 16                          |                     |                            |
| 17                          |                     |                            |
| 18                          |                     |                            |
| 19                          |                     |                            |
| 20                          |                     |                            |
| 21                          |                     |                            |
| 22                          |                     |                            |

1 THE VIDEOGRAPHER: This is videotape No. 1 in  
2 the videotaped deposition of Dr. Maureen Donovan,  
3 taken by plaintiffs' counsel in the matter of Meda  
4 Pharmaceuticals, Inc., and Cipla, Limited, versus  
5 Apotex, Inc., in the United States District Court  
6 for the District of Delaware, Case No. 1:15-CV-785.

7 This deposition is being held at Winston &  
8 Strawn, LLP, 35 West Wacker Drive, Chicago,  
9 Illinois, on Friday, October 7, 2016. The time on  
10 the video screen is 9:06 a.m.

11 My name is Kim Ortiz. I am the legal  
12 videographer from Digital Evidence Group. The court  
13 reporter is Rachel Gard, in association with Digital  
14 Evidence Group.

15 Will counsel please introduce themselves  
16 for the record.

17 MS. EVERETT: Uma Everett from Sterne, Kessler,  
18 Goldstein & Fox on behalf of plaintiffs. With me  
19 today is my colleague, Rami Bardenstein.

20 MR. WARNER: Kevin Warner of Winston & Strawn  
21 on behalf of Apotex and the witness.

22 THE VIDEOGRAPHER: Will the court reporter

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.