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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

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NOVARTIS PHARMACEUTICALS

C.A. No. 14-1196-RGA

CORPORATION and NOVARTIS AG,

Plaintiffs,

v.

WEST-WARD PHARMACEUTICALS,

Defendant.

-----X

NOVARTIS PHARMACEUTICALS

C.A. No. 15-128-RGA

CORPORATION and NOVARTIS AG,

Plaintiffs,

v.

(Continued caption.)

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NOVARTIS PHARMACEUTICALS
CORPORATION and NOVARTIS AG,

C.A. No. 14-1508-RGA

Plaintiffs,

v.

WEST-WARD PHARMACEUTICALS,
Defendant.

-----X

NOVARTIS PHARMACEUTICALS
CORPORATION and NOVARTIS AG,
Plaintiffs,

C.A. No. 15-474-RGA

v.

WEST-WARD PHARMACEUTICALS,
Defendant.

-----X

March 3, 2017

9:30 a.m.

Videotaped deposition of DANIEL CHANG
CHO, M.D., held at the offices of GOODWIN
PROCTER LLP, 620 Eighth Avenue, New York,
New York, pursuant to Notice, before
Annette Arlequin, a Certified Court
Reporter, a Registered Professional
Reporter, a Certified Realtime Reporter,
and a Notary Public of the State of New York.

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A P P E A R A N C E S:

FITZPATRICK, CELLA, HARPER & SCINTO

Attorneys for Plaintiffs

1290 Avenue of the Americas

New York, New York 10104

BY: CHARLOTTE JACOBSEN, ESQ.

SUSANNE FLANDERS, ESQ.

GOODWIN PROCTER

Attorneys for Defendant

The New York Times Building

620 Eighth Avenue

New York, New York 10018

BY: MICHAEL COTTLER, ESQ.

ALSO PRESENT:

RODOLFO DURAN, Legal Video Specialist

1

2 IT IS HEREBY STIPULATED AND AGREED by
3 and between the attorneys for the
4 respective parties herein, that filing and
5 sealing be and the same are hereby waived;

6 IT IS FURTHER STIPULATED AND AGREED
7 that all objections, except as to the form
8 of the question, shall be reserved to the
9 time of the trial;

10 IT IS FURTHER STIPULATED AND AGREED
11 that the within deposition may be sworn to
12 and signed before any officer authorized to
13 administer an oath, with the same force and
14 effect as if signed and sworn to before the
15 Court.

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1 D. Cho

2 THE VIDEOGRAPHER: This is DVD No. 1
3 of the video-recorded deposition of Daniel
4 Chang Cho, M.D. in the matter Novartis
5 Pharmaceuticals Corporation and Novartis AG
6 versus Roxane Laboratories, Inc. in the
7 United States District Court for the
8 District of Delaware.

9 This deposition is being held at the
10 law offices of Goodwin Procter LLP located
11 at 620 Eighth Avenue, New York, New York,
12 on March 3rd, 2017, approximately 9:34 a.m.

13 My name is Rodolfo Duran. I am the
14 legal video specialist. The court reporter
15 today is Annette Arlequin and we are both
16 in association with TSG Reporting, Inc.

17 Will counsel please introduce
18 yourselves.

19 MS. JACOBSEN: Charlotte Jacobsen
20 from Fitzpatrick on behalf of the Novartis
21 plaintiffs. And with me is Susanne
22 Flanders, also from Fitzpatrick.

23 MR. COTTLER: Michael Cottler from
24 the law firm of Goodwin Procter on behalf
25 of the defendant, which is now Westward,

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