

## Iyer, Natasha

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**From:** Cieslak-Tochigi, Aya <acieslaktochigi@mccarter.com>  
**Sent:** Friday, June 17, 2016 4:57 PM  
**To:** O'Shaughnessy, William; Arlene Apodaca; Doug Carsten; Kathryn Robinson; Leton, Margaret Saldana; Patel, Ravin; Veronica Ascarrunz; William Jackson; 'lwalsh@thewalshfirm.com'; 'Tricia B. O'Reilly'; MNutter@winston.com; kmathas@winston.com; Barbara E. Troyan; 'Joseph Linares'; Adam Burrowbridge; Arnell, Eric; UTC WSGR; Ugolev, Olga  
**Subject:** United Therapeutics Corp. v. Watson Laboratories, Inc.: Civ. A. No. 3:15-cv-05723 - Motion for leave to file an amended complaint  
**Attachments:** 2016 06 15 Decl ISO re First Amended Complaint Against Watson-c.pdf; 2016 06 15 Notice of Motion re First Amended Complaint Against Watson-c.pdf; 2016 06 16 Memo of Law re First Amended Complaint Against Watson\_(check font size)-c.pdf; Exhibit A - Amended Complaint-c.pdf; Proposed Form of Order - Leave to File and Amended Complaint-c.pdf

Counsel,

Please see the attached, which we electronically filed with the Court today.

Thank you.

Aya



Aya Cieslak-Tochigi | Associate  
McCARTER & ENGLISH, LLP

100 Mulberry Street, Four Gateway Center | Newark, New Jersey 07102

T: 973-849-4033

F: 973-297-3720

[acieslaktochigi@mccarter.com](mailto:acieslaktochigi@mccarter.com) | [www.mccarter.com](http://www.mccarter.com)

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William J. O'Shaughnessy  
McCARTER & ENGLISH LLP  
Four Gateway Center  
100 Mulberry Street  
Newark, NJ 07102  
(973) 639-2094  
woshaughnessy@mccarter.com

**OF COUNSEL:**  
Douglas Carsten  
WILSON SONSINI GOODRICH & ROSATI  
12235 El Camino Real  
Suite 200  
San Diego, CA 92130

William C. Jackson  
BOIES, SCHILLER & FLEXNER LLP  
5301 Wisconsin Avenue, NW  
Washington, DC 20015

*Attorneys for Plaintiff  
United Therapeutics Corporation*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

UNITED THERAPEUTICS CORPORATION )  
Plaintiff, )  
v. ) Civil Action No.: 3:15cv-05723-PGS-LHG  
WATSON LABORATORIES, INC., )  
Defendant. ) **DECLARATION OF**  
 ) **WILLIAM J. O'SHAUGHNESSY**  
 )  
 )

I, William J. O'Shaughnessy, of full age, hereby declare as follows:

1. I am an attorney at the law firm of McCarter & English LLP for Plaintiff United Therapeutics Corporation ("Plaintiff") in the above-captioned matter. I am familiar with the

facts of this case and make this Declaration in support of Plaintiff's Motion for Leave to File an Amended Complaint.

2. Attached hereto as Exhibit A is a true and correct copy of Plaintiff's proposed First Amended Complaint and Jury Demand.

I declare that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willingly false, I may be subject to punishment.

Dated: June 17, 2016

s/ William J. O'Shaughnessy  
William J. O'Shaughnessy

William J. O'Shaughnessy  
McCARTER & ENGLISH LLP  
Four Gateway Center  
100 Mulberry Street  
Newark, NJ 07102  
(973) 639-2094  
woshaughnessy@mccarter.com

**OF COUNSEL:**

Douglas Carsten  
WILSON SONSINI GOODRICH & ROSATI  
12235 El Camino Real  
Suite 200  
San Diego, CA 92130

William C. Jackson  
BOIES, SCHILLER & FLEXNER LLP  
5301 Wisconsin Avenue, NW  
Washington, DC 20015

*Attorneys for Plaintiff  
United Therapeutics Corporation*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

UNITED THERAPEUTICS CORPORATION )

Plaintiff, )

v. )

WATSON LABORATORIES, INC., )

Defendant. )

Civil Action No: 3:15-cv-05723 PGS-LHG

**NOTICE OF MOTION  
FOR LEAVE TO FILE  
AN AMENDED COMPLAINT**

**Motion Date: July 18, 2016**

TO: Liza M. Walsh  
Tricia B. O'Reilly  
Joseph L. Linares  
Walsh Pizzi O'Reilly Falanga LLP  
One Newark Center, 1085 Raymond Boulevard, 6th Floor  
Newark, NJ 07102  
(973) 757-1100

PLEASE TAKE NOTICE that on July 18, 2016, or as soon thereafter as counsel may be heard, the undersigned attorneys for Plaintiff United Therapeutics Corp. (“Plaintiff”) shall move before the United States District Court for the District of New Jersey, Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, New Jersey, for an Order granting Plaintiff’s Motion for Leave to File an Amended Complaint.

PLEASE TAKE FURTHER NOTICE that in support of its Motion, Plaintiff will rely on its Memorandum of Law and Declaration of William J. O’Shaughnessy (and the exhibit annexed thereto). A proposed form of Order is also enclosed; and

PLEASE TAKE FURTHER NOTICE counsel for Defendant Watson Laboratories Inc. does not oppose this Motion.

Respectfully submitted,

*Of Counsel*

Douglas Carsten  
WILSON SONSINI GOODRICH & ROSATI  
12235 El Camino Real  
Suite 200  
San Diego, CA 92130

Veronica S. Ascarrunz  
WILSON SONSINI GOODRICH & ROSATI  
1700 K Street, NW  
Suite 500  
Washington, DC 20006

William C. Jackson  
BOIES, SCHILLER & FLEXNER LLP  
5301 Wisconsin Avenue, NW  
Washington, DC 20015

s/William J. O’Shaughnessy  
William J. O’Shaughnessy  
MCCARTER & ENGLISH LLP  
Four Gateway Center  
100 Mulberry Street  
Newark, NJ 07102  
(973) 639-2094  
woshaughnessy@mccarter.com

Dated: June 17, 2016

*Attorneys for Plaintiff*  
*United Therapeutics Corporation*

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