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From: Cieslak-Tochigi, Aya <acieslaktchigi@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
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*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.,)
) **DECLARATION OF**
Defendant.) **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
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*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
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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

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Dated: June 17, 2016

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