

1 UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF NEW JERSEY

3 SANOFI-AVENTIS U.S. LLC,  
4 SANOFI-AVENTIS DEUTSCHLAND  
5 GMBH, and SANOFI WINTHROP  
6 INDUSTRIE,

7 Plaintiffs,

8 vs.

CIVIL ACTION NUMBER:

2:17-cv-09105-SRC-CLW

9 MYLAN GMBH, BIOCON LTD.,  
10 BIOCON RESEARCH LTD.,  
11 BIOCON SDN, BHD., and  
12 BIOCON S.A.,

VOLUME 3

13 Defendants.

**TRIAL**

14 MARTIN LUTHER KING BUILDING & U.S. COURTHOUSE  
15 50 Walnut Street, Newark, New Jersey 07101  
16 December 4, 2019  
17 Commencing at 2:00 p.m.

18 **B E F O R E: THE HONORABLE STANLEY R. CHESLER,**  
19 **UNITED STATES DISTRICT JUDGE**

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United States District Court  
Newark, New Jersey

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Newark, New Jersey

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1 Is the plaintiff ready to proceed?

2 MR. DESAI: Your Honor, the plaintiffs call  
3 Dr. Alexander Slocum.

4 THE COURT: Please sit down.

5 THE DEPUTY CLERK: Please place your left hand on the  
6 Bible and raise your right.

7 (**DR. ALEXANDER HENRY SLOCUM**, having been duly sworn as a witness,  
8 testified as follows:)

9 THE DEPUTY CLERK: Please state your full name for  
10 the record.

11 THE WITNESS: Alexander Henry Slocum.

12 THE DEPUTY CLERK: Please spell your last name.

13 THE WITNESS: S-L-O-C-U-M.

14 THE DEPUTY CLERK: Thank you.

15 MR. CARSTON: Your Honor, I don't mean to interfere  
16 with my learned friend's examination, there is one exhibit for  
17 which we've been unable to resolve a dispute. It's an exhibit  
18 that the witness hasn't used at all in his expert reports. It  
19 came up for the first time with my infringement --  
20 noninfringement expert, Michael Quinn. I don't know the  
21 purpose which they're trying to use it, but I've been assured  
22 by Mr. Desai that they will try to use it.

23 May I just see how the examination goes, see what  
24 they try to do with it, and raise an objection at that point?

25 THE COURT: You may.

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1 MR. CARSTON: Thank you, Your Honor.

2 THE COURT: Proceed.

3 (DIRECT EXAMINATION OF DR. ALEXANDER HENRY SLOCUM BY MR. DESAI:)

4 Q Good afternoon.

5 A Good afternoon.

6 Q Could you please state your name for the record?

7 A Alexander Slocum Henry.

8 Q What is your occupation, Dr. Slocum?

9 A I am a professor of mechanical engineering at the  
10 Massachusetts Institute of Technology in Cambridge,  
11 Massachusetts.

12 Q Dr. Slocum, why are you here today?

13 A I'm here today to provide technical opinions regarding the  
14 '844 patent.

15 Q What issues are you here to testify about specifically?

16 A On the validity of the patent.

17 Q Okay. And have you ever previously offered expert  
18 opinions on the issue of patent invalidity?

19 A I have.

20 Q About how many times have you done that?

21 A Probably a couple of dozen.

22 Q Okay. Let's talk about your qualifications.

23 Please tell us about your education.

24 A I have a bachelor of science, master of science, and Ph.D.  
25 in mechanical engineering, all from MIT in the years 1982, '83,

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