

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED THERAPEUTICS)	
CORPORATION,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 20-755 (RGA)
)	
LIQUIDIA TECHNOLOGIES, INC.,)	
)	
Defendant.)	

**UNITED THERAPEUTICS CORP.’S MOTION FOR THE ISSUANCE OF
A LETTER OF REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE**

Plaintiff United Therapeutics Corporation (“United Therapeutics”) respectfully moves the Court for an order to issue a Letter of Request for assistance of the central judicial authority for the Republic of Korea for the purpose of obtaining the production of relevant documents and property from Yonsung Fine Chemicals Co., Ltd, and to take the depositions of three of Yonsung’s employees.

United Therapeutics’s supporting memorandum of law and the proposed Letter of Request are filed concurrently. A proposed order is attached hereto.

Counsel for United Therapeutics discussed this motion with counsel for Defendant Liquidia Technologies on April 29, 2021, and shared a draft copy of the motion at Liquidia’s counsel’s request. Liquidia’s counsel indicated on April 30, 2021 that it opposes the motion.

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/s/ Michael J. Flynn

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April 30, 2021

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*Attorneys for Plaintiff United Therapeutics
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RULE 7.1.1 CERTIFICATE

I hereby certify that the subject of the foregoing motion has been discussed with counsel for Defendant Liquidia Technologies and Defendant opposes the motion.

/s/ Michael J. Flynn

Michael J. Flynn (#5333)

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)	
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[PROPOSED] ORDER

AND NOW, this ___ day of May, 2021, upon consideration of the Motion by Plaintiff United Therapeutics Corporation for the Issuance of a Letter of Request For International Judicial Assistance, pursuant to 28 U.S.C. § 1781(b), Federal Rule of Civil Procedure 28(b), and the Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters (Hague Convention), and any opposition thereto, IT IS HEREBY ORDERED that said Motion is GRANTED.

IT IS FURTHER ORDERED as follows:

1. The Letter of Request submitted by United Therapeutics Corporation with this Motion is hereby approved and shall be signed by the Court.
2. After the Court signs the Letter of Request, it shall be forwarded to the Clerk of Court where it shall be authenticated and the Court’s seal shall be affixed thereto.
3. The Court shall, as authorized pursuant to 28 U.S.C. § 1781(b), thereafter promptly transmit the Letter of Request to the Central Authority in the Republic of Korea for transmittal to the appropriate Competent Authority of the Republic of Korea for execution, in conformity

with Article 2 of the Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Criminal Matters.

Dated: May __, 2021

Hon. Richard G. Andrews

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