Exhibit 10

		Page 1
1	IN THE UNITED STATES DISTRICT COURT	
2	FOR THE NORTHERN DISTRICT OF	
3	WEST VIRGINIA	
4	Civil Action No. 1:22-cv-00061-TSK	
5	x	
6	REGENERON PHARMACEUTICALS, INC.,	
7	Plaintiff,	
8	-against-	
9	MYLAN PHARMACEUTICALS INC.,	
10	Defendant.	
11	x	
12	650 Fifth Avenue	
	New York, New York	
13		
	December 16, 2022	
14	9:12 a.m.	
15		
16	VIDEOTAPED HYBRID DEPOSITION of	
17	KAREN CHU, a witness in the	
18	above-entitled action, held at the above	
19	time and place, taken before Dawn Matera,	
20	a Shorthand Reporter and Notary Public of	
21	the State of New York.	
22	* * *	
23		
24		
25		



1		Page 2		Page
1 A	APPEARANCES: (Continued)		1	THE VIDEOGRAPHER: Good morning.
3	WILLIAMS & CONNOLLY LLP		2	We are going on the record at
4	Attorneys for Regeneron Pharmaceuticals, Inc.		3	a.m. Eastern Standard Time. Please
5	680 Maine Ave S.W. Washington, D.C. 20024		4	note that the microphones are
6	By: ELLEN E. OBERWETTER, ESQ.		5	sensitive and may pick up whispering
7	eoberwetter@wc.com KATHRYN S. KAYALI, ESQ.		6	and private conversations. Please
	kkayali@wc.com		7	mute your phones at this time. Audio
8 9			8	and video recording will continue to
	RAKOCZY MOLINO MAZZOCHI SIWIK LLP		9	take place unless all parties agree to
10	Attorneys for Mylan Pharmaceuticals 6 W. Hubbard Street		10	go off the record.
11	Suite 500		11	This is media unit 1 of the
12	Chicago, Illinois 60654		12	
	By: DEANNE M. MAZZOCHI, ESQ.			video-recorded deposition of Karen Chu
13	dmazzochi@rmmslegal.com (Remote Attendance)		13	taken by counsel in the matter of
14	JEFFREY A. MARX, ESQ.		14	Regeneron Pharmaceuticals, Inc. versus
15	jmarx@rmmslegal.com HEINZ J. SALMEN, ESQ.		15	Mylan Pharmaceuticals, Inc., filed in
16	hsalmen@rmmslegal.com (Remote Attendance)		16	the United States District Court for
17	(Remote Attendance)		17	the Northern District of West
18	CAREY DOUGLAS KESSLER & RUBY PLLC Local Counsel for Regeneron		18	Virginia, civil action number
19	Pharmaceuticals, Inc.		19	1:22-CV-00061-TSK.
20	707 Virginia Street East 901 Chase Tower	12	20	The location of this deposition
	Charleston, West Virginia 25301		21	is in the offices of Williams &
21	By: DAVID POGUE, ESQ.		22	Connolly, 650 Fifth Avenue, New York,
22	drpogue@cdkrlaw.com		23	New York. My name is Zef Cota and I
23	(Remote Attendance.)		24	am the videographer. The court
24 25			25	reporter is Dawn Matera, from the firm
		Page 3		Page
1	APPEARANCES: (Continued)	1 age 3	1	of Veritext.
2	TIT I ZITICITI (C Z Z I (Commucu)		2	I am not authorized to
3	STEPTOE & JOHNSON PLLC		3	administer an oath. I am not related
	Local Counsel for Mylan		3 4	
4	707 Virginia Street East			to any party in this action nor am I
	Chase Tower, 17th Floor		5	financially interested in the outcome.
5	Charleston, West Virginia 25301		6	Counsel and all present in the
6	By: JOHN PIZZO, ESQ.		7	room have been noted for the
	john.pizzo@steptoe-johnson.com		8	stenographic record.
7	(Remote Attendance)		9	Will the court reporter please
8			10	swear in the witness and then counsel
9			11	may proceed.
0	Also Present:		12	KAREN CHU, the Witness herein,
1	ADAM BERNSTEIN, Regeneron		13	having first been duly sworn by the
12	PETRA SCAMBOROVA, Regeneron		14	Notary Public, was examined and testified
13	ZEF COTA, Videographer	I .	15	as follows:
4	~oOo~		16	EXAMINATION BY MS. MAZZOCHI:
5			17	
l6 l7				, , , , , , , , , , , , , , , , , , ,
18			18	Ms. Chu, my name is Deanne Mazzochi.
10			19	Can you please state your full
20			20	name and address for the record.
-0			21	A. Yes, Karen Chu, and my home
1			22	address is 73 Richbell Road, White
		, , <u>, , , , , , , , , , , , , , , , , </u>		dadress is 75 Idence II Itoda, 11 Inte
21 22 23			23	Plains, New York 10605.
		2		

1 A. I previously gave testimony 2 under oath in a different case many, many 3 years ago. 4 Q. Okay. Do you recall did 5 that case involve Regeneron? 6 A. It did not. 7 Q. Did it involve any VEGF 8 inhibitors? 9 A. It did not. It involved a 10 personal liability suit against the 11 summer camp I went to. 12 Q. Have you participated at all in 13 any FTC proceedings prior to being 14 deposed in this case? 15 A. No, I have not. 16 Q. Have you been asked to provide 17 documents or records in connection with 18 any matter involving the United States 19 government and Regeneron? 20 A. I have not. 21 Q. How about any claims involving 22 a state government? 23 A. No, not that I am aware. 24 Q. How about any litigation 25 involving Regeneron and an insurer or an 26 M. A. Not that I am aware of. 3 Q. Have you received any subpoenas 4 to appear before a state or federal grand 5 jury? 6 A. I have not received any 8 subpoenas. 9 Q. Can you please state for the 9 record your educational background post 10 high school? 11 A. Sure. I have a bachelor's of 12 science degree in biology from Cal Poly 13 San Luis Obispo and a master's in human 14 nutrition from Columbia University, 15 Q. And can you please describe 16 your employment history after you 17 graduated from Columbia University with 18 you are your MS in human nutrition? 19 A. Sure. After graduation and 20 completion of my degree, I joined a complany 21 A. Roy over the very first position I had in clinical research was 22 as a clinical trial assistant. And as 23 part of my role I helped with the 24 operations of clinical trials and 25 reaction of my degree, I joined a complation of my degree, I joined a complation called Barton & research organization called Barton & the wy over we agene therea, to did you and a master's in human in utrition in from Columbia University with 18 you are your MS in human nutrition? 19 A. Sure. After graduation and 20 completion for my degree, I joined a called GenVec. They were a gene thereat university with 21 your graduated from Columb	1			
2 Under oath in a different case many, many 3 years ago. 4 Q. Okay. Do you recall did 5 that case involve Regeneron? 6 A. It did not. 7 Q. Did it involve any VEGF 8 inhibitors? 9 A. It did not. It involved a 10 personal liability suit against the 11 summer camp I went to. 12 Q. Have you participated at all in 13 any FTC proceedings prior to being 14 deposed in this case? 15 A. No, 1 have not. 16 Q. Have you been asked to provide 17 documents or records in connection with 18 any matter involving the United States 19 government and Regeneron? 20 A. I have not. 21 Q. How about any claims involving 22 a state government? 23 A. No, not that I am aware. 24 Q. How about any litigation 25 involving Regeneron and an insurer or an 26 A. Not that I am aware of. 3 Q. Have you preceived any subpoenas 4 to appear before a state or federal grand 5 jury? 4 MMO? 5 HMO? 5 La Very or that I am aware of. 6 A. I have not received any subpoenas 4 to appear before a state or federal grand 5 jury? 6 A. Thave not received any subpoenas 4 to appear before a state or federal grand 5 jury? 6 A. Sure. I have a bachelor's of 6 San Luis Obispo and a master's in human nutrition from Columbia University. 16 Q. And can you please describe 17 you are now ployment history after you graduated from Columbia University with you are your MS in human nutrition? 18 you are your MS in human nutrition? 19 A. Sure. After graduation and completion of my degree, I joined a small contract & Polaraby Carlot on Wart I training did you get involved in or what training did you get involved in or demander of the form. 12 Pharma. And then worked for thew for landard training involving feel on the sace? 13 Q. How doud and from the form. 14 MS. OBERWETTER: Object to the form. 15 You can answer it. 16 A. Okay. Just a	1	Page 6		=
3 years ago. 4 Q. Okay. Do you recall did 5 that case involve Regeneron? 6 A. It did not. 7 Q. Did it involved a 7 Poper 8 inhibitors? 8 inhibitors? 8 inhibitors? 9 A. It did not. It involved a 9 personal liability suit against the 11 summer camp I went to. 12 Q. Have you participated at all in 13 any FTC proceedings prior to being 15 A. No, I have not. 16 Q. Have you been asked to provide 17 documents or records in connection with any matter involving the United States 18 government and Regeneron? 19 A. No, not that I am aware. 23 A. No, not that I am aware. 24 Q. How about any litigation 25 involving Regeneron and an insurer or an 26 yilly? 27 A. I have not. 28 A. No, that I am aware of. 3 Q. Have you received any subpoenas 4 to appear before a state or federal grand 5 jury? 1				
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5 that case involve Regeneron? 6 A. It did not. 7 Q. Did it involve any VEGF 8 inhibitors? 9 A. It did not. It involved a 10 personal liability suit against the 11 summer camp I went to. 12 Q. Have you participated at all in 13 any FTC proceedings prior to being 14 deposed in this case? 15 A. No, I have not. 16 Q. Have you been asked to provide 17 documents or records in connection with 18 any matter involving the United States 19 government and Regeneron? 20 A. I have not. 21 Q. How about any claims involving 22 a state government? 23 A. No, not that I am aware. 24 Q. How about any litigation 25 involving Regeneron and an insurer or an 1 HMO? 2 A. Not that I am aware of. 3 Q. Have you preceived any subpoenas 4 to appear before a state or federal grand 5 jury? 6 A. I have not received any 7 subpoenas. 8 Q. Can you please state for the 9 record your educational background post 10 high school? 11 A. Sure. I have a bachelor's of 12 science degree in biology from Cal Poly 13 San Luis Obispo and a master's in human 14 nutrition from Columbia University with 15 you are your MS in human nutrition? 16 Q. And can you please describe 17 your employment history after you 18 graduated from Columbia University with 19 you are your MS in human nutrition? 19 A. Sure. After graduation and 20 completion of my degree, I joined a small 21 biotech company located in the San 22 Francisco Bay area called Seqirus 24 After working at that company 25 C. After working at that company 26 C. Do you have any certifications 27 Polaroscoding may take the tast, I joined a company 28 that was headquartered in Gaithersburg. 48 Maryland called GenVec. They were a gene therapy company. And after Jieft — I 41 was with GenVec for four years before 40 therapy company. And after Jieft — I 41 was headquartered in Gaithers burg. 41 Maryland called GenVec. They were a gene therapy company. And after Jieft — I 41 was headquartered in Gaithersburg. 41 Maryland called GenVec. They were a gene theraps company. And after Jieft — I 41 was headquartered in Ga		•		
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7 After that, I joined a company 8 inhibitors? 9 A. It did not. It involved a 10 personal liability suit against the 11 summer camp I went to. 12 Q. Have you participated at all in 13 any FTC proceedings prior to being 14 deposed in this case? 15 A. No, I have not. 16 Q. Have you been asked to provide 17 documents or records in connection with 18 any matter involving the United States 19 government and Regeneron? 20 A. I have not. 21 Q. How about any claims involving 22 a state government? 23 A. No, not that I am aware. 24 Q. How about any litigation 25 involving Regeneron and an insurer or an 1 HMO? 2 A. Not that I am aware of. 3 Q. Have you received any subpoenas 4 to appear before a state or federal grand 5 jury? 6 A. I have not received any 10 san Luis Obispo and a master's in human 11 untrition from Columbia University. 12 Q. And can you please describe 13 deposed in this case? 14 what training did you get involved in or 15 connection with clinical - human 16 untril trials and received any subpoenas. 18 Q. Can you please state for the 19 record your educational background post 10 high school? 11 A. Sure. I have a bachelor's of 12 science degree in biology from Cal Poly 13 San Luis Obispo and a master's in human 14 untrition from Columbia University with 15 you are your MS in human nutrition? 16 Q. Have your bease describe 16 your employment history after you 17 graduated from Columbia University with 18 you are your MS in human nutrition? 19 A. Sure. After graduation and 20 completion of my degree, I joined a small 21 biotech company loaded in the San 22 Francisco Bay are a called Seqirus 23 that was headquartered in Gaithersburg, 24 Martinal called Gevec for four years before 25 pland called Gevec for four years before 26 therapy company. And after I left — I 27 was with GenVec for four years before 28 to did you get involved in or 29 was triling all delow for what training did you get involved in or 20 was trib device for four year seven in solution. 21 was trib devide you and involved in or 22 was trib				
8 inhibitors? 9 A. It did not. It involved a 10 personal liability suit against the 2 summer camp I went to. 11 summer camp I went to. 12 Q. Have you participated at all in 2 any FTC proceedings prior to being 14 deposed in this case? 15 A. No, I have not. 15 connection with 18 any matter involving the United States 19 government and Regeneron? 10 A. I have not. 10 Q. How about any claims involving 2 a state government? 2 as tate government? 2 as tate government? 2 as tate government? 2 as tate government? 2 as involving Regeneron and an insurer or an 1 HMO? 2 A. Not that I am aware. 2 Q. How about any litigation 2 involving Regeneron and an insurer or an 1 HMO? 2 A. Not that I am aware of. 3 Q. Have you received any subpoenas 4 to appear before a state or federal grand 5 jury? 1 Suppoenas. 2 Q. Can you please state for the 9 record your educational background post 10 high school? 1 science degree in biology from Cal Poly 13 San Luis Obispo and a master's in human nutrition from Columbia University. 14 by our employment history after you 17 graduated from Columbia University with 18 you are your MS in human nutrition? 19 A. Sure. After graduation and 20 completion of my degree, I joined a small 21 biotech company located in the San 2 race and called Sequivs 2 harmonization standards? 2 After working at that company 4 Aft				*
9 Maryland called GenVec. They were a gene therapy company. And after 1 left — I usumer camp I went to. 12 Q. Have you participated at all in any FTC proceedings prior to being 13 any FTC proceedings prior to being 14 deposed in this case? 15 A. No, I have not. 16 Q. Have you been asked to provide 16 documents or records in connection with 18 any matter involving the United States 19 government and Regeneron? 19 You can answer it. 19 government and Regeneron? 19 You can answer it. 20 A. I have not. 21 Q. How about any claims involving 22 a state government? 22 a No, not that I am aware. 23 A. No, not that I am aware. 24 Q. How about any litigation 25 involving Regeneron and an insurer or an 19 HMO? 2 A. Not that I am aware of. 3 Q. Have you received any subpoenas 4 to appear before a state or federal grand 5 jury? 10 A. Sure. I have a bachelor's of 10 high school? 11 A. Sure. I have a bachelor's of 12 science degree in biology from Cal Poly 13 San Luis Obispo and a master's in human 14 nutrition from Columbia University with you are your MS in human nutrition? 19 A. Sure. After graduation and 20 completion of my degree, I joined a small 21 biotech company located in the San 22 Francisco Bay area called Seqirus 24 After working at that company 42 certifications.				
10 personal liability suit against the summer camp I went to. 11				
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12 Q. Have you participated at all in any FTC proceedings prior to being deposed in this case? 14 what training did you receive in connection with clinical human clinical trials? 16 Q. Have you been asked to provide documents or records in connection with 18 any matter involving the United States government and Regeneron? 19 MS. OBERWETTER: Object to the form. 20 A. I have not. 21 Q. How about any claims involving a state government? 22 A. No, not that I am aware. 23 A. No, not that I am aware. 24 Q. How about any litigation 25 involving Regeneron and an insurer or an 26 Regeneron? 27 Was a state government? 28 A. Not that I am aware of. 29 A. Not that I am aware of. 20 A. Not that I am aware of. 21 into quality assurance roles and clinical research roles such as at GenVec, you 3 know, how did you what type of training did you get in order to 26 elither in connection with those roles? A. Okay. Just a clarification, 21 are you asking about training I received throughout my career or specific to 22 Regeneron? 23 Regeneron? 24 Q. Right, throughout your career, 25 because with an MS in nutrition, jumping 26 Training did you what type of training did you what type of training did you get in order to 26 elither in connection with those roles? A. Sure. So the very first 27 position I had in clinical research was as a clinical trial assistant. And as part of my role I helped with the operations of clinical practice training as part of my role. So GCP training was provided 16 population of my degree, I joinne Regeneron 16 don't hold any current 17 what training did you get involved in or onnection with either clinical practices. Now, how did you what type of training did you get involved in or onnection with those roles? A. Sure. So the very first position I had in clinical research was as a clinical trial assistant. And as part of my role I helped with the op				
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	Page 10		Dage 12
1	A. Previously I did have a	1	Page 12 for a lot of small companies, in that
2	certified contract research associate	2	role wore several different hats and had
3	certification.	3	a broad range of responsibilities as it
4	Q. And how did you get that?	4	related to clinical development. And
5	A. That required a certain number	5	over the years moved into more of a
6	of hours as well as taking an exam	6	clinical project management role and then
7	through the Association of Clinical	7	finally into my current role.
8	Research Professionals.	8	Q. Okay. And was your initial
9	Q. Is there a reason why you	9	title, what was it, director of
10	allowed your certification on that to	10	therapeutic area, project management?
11	lapse?	11	A. So that was not my first title
12	A. So in my over 25 years of	12	at Regeneron.
13	experience in clinical development, it	13	Q. Okay. What was your first
14	was not critical to the role I have now	14	title?
15	and felt that it was not necessary to	15	A. My recollection is that my
16	keep that certification.	16	first title was senior clinical trial
17	Q. All right. Tell me how you	17	manager. But the director of therapeutic
18	came to be employed at Regeneron?	18	area project management was a promotion
19	A. So the company I worked for	19	into a broader clinical project
20	just prior to Regeneron, GenVec, was a	20	management role.
21	small biotechnology firm, and they were	21	Q. And then did you ever have any
22	having some, as many biotechnology	22	individuals who reported to you in those
23	companies do, some troubles with funding	23	roles?
24	as well as some hiccups in terms of being	24	A. At the time that I was a
25	able to move products forward in their	25	clinical trial manager I had a group of
	Page 11		Page 13
1	pipeline. And at the time I was working	1	people that reported to me who, who were
2	both on a product they had in development	2	more junior clinical trial managers and
3	for oncology as well as ophthalmology.	3	involved in the operations of the
4	And when the company conducted a round of	4	clinical trials.
5	layoffs I personally was not laid off,	5	Q. Okay. How do you differentiate
6	but it certainly signaled some	6	what your role was versus what you call
7	uncertainty in the company's future. I	7	the operations of the clinical trials?
8	made a decision to start looking	8	A. So within clinical research,
9	potentially for another position.	9	there are several people who contribute
10	At the time I was already	10	to any aspect of conducting a clinical
11	living in the New York area and Regeneron	11	trial. So the actual operations of the
12	was very much in the news because of	12	clinical trial, which includes everything
13	their because of the VEGF-Trap	13	from ensuring that clinical study sites
14	molecule and their work in oncology. And	14	are identified and trained appropriately
15	so I networked with a friend of mine and	15	to providing supplies for the clinical
16	contacted a few people in the company to	16	study sites, to deciding which
17	see if they had a need for somebody with	17	laboratories to use or how labs will be
18	my background. Dr. Jesse Cedarbaum was	18	collected. That typically is considered
19	the person who hired me first at	19	part of the operations role. So they're
20	Regeneron.	20	really, that, you know, they really
21	Q. And then what was your initial	21	oversee the actual execution of the
100	role and reconneithilities at Pageneron'	22	clinical trials.
22	role and responsibilities at Regeneron?	22	O Olson A d
23	A. So when I joined the company I	23	Q. Okay. And then who when you
	-	23 24 25	Q. Okay. And then who when you were at Regeneron, say, in the when you first joined Regeneron, who was



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