

Exhibit 2

PATENT

**U.S. District Court
District of Delaware (Wilmington)
CIVIL DOCKET FOR CASE #: 1:22-cv-00296-CFC**

Novo Nordisk A/S et al v. Sun Pharmaceutical Industries Ltd. et al

Date Filed: 03/04/2022

Jury Demand: None

Nature of Suit: 835 Patent – Abbreviated New Drug Application(ANDA)

Jurisdiction: Federal Question

Assigned to: Judge Colm F. Connolly

Related Cases: [1:21-cv-01782-CFC](#)

[1:22-cv-00294-CFC](#)

[1:22-cv-00295-CFC](#)

[1:22-cv-00299-CFC](#)

[1:22-cv-00297-CFC](#)

[1:22-cv-00298-CFC](#)

Cause: 35:271 Patent Infringement

Plaintiff

Novo Nordisk A/S

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Plaintiff

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ATTORNEY TO BE NOTICED

V.

Defendant

Sun Pharmaceutical Industries Ltd.

Defendant

Sun Pharmaceutical Industries Inc.

Date Filed	#	Docket Text
03/04/2022	<u>1</u>	COMPLAINT filed against Sun Pharmaceutical Industries Ltd., Sun Pharmaceutical

		ADEDC-3817619.) – filed by Novo Nordisk Inc., Novo Nordisk A/S. (Attachments: # <u>1</u> Exhibit A-B, # <u>2</u> Civil Cover Sheet)(apk) (Entered: 03/04/2022)
03/04/2022	<u>2</u>	Notice, Consent and Referral forms re: U.S. Magistrate Judge jurisdiction. (apk) (Entered: 03/04/2022)
03/04/2022	<u>3</u>	Supplemental information for patent cases involving an Abbreviated New Drug Application (ANDA) – Date Patentee(s) Received Notice: 1/28/2022. Date of Expiration of Patent: SEE ANDA FORM.Thirty Month Stay Deadline: 6/5/2025. (apk) (Entered: 03/04/2022)
03/04/2022	<u>4</u>	Report to the Commissioner of Patents and Trademarks for Patent/Trademark Number(s) 9,132,239 B2 ;10,335,462 B2. (apk) (Entered: 03/04/2022)
03/04/2022	<u>5</u>	Disclosure Statement pursuant to Rule 7.1: identifying Corporate Parent Novo A/S for Novo Nordisk A/S; Corporate Parent Novo Nordisk US Holdings, Inc. for Novo Nordisk Inc. filed by Novo Nordisk A/S, Novo Nordisk Inc. (apk) (Entered: 03/04/2022)
03/04/2022	<u>6</u>	Summons Issued as to Sun Pharmaceutical Industries Ltd. on 3/4/2022; Sun Pharmaceutical Industries Inc. on 3/4/2022. (Attachments: # <u>1</u> Summons Issued)(apk) (Entered: 03/04/2022)
03/07/2022	<u>7</u>	SUMMONS Returned Executed by Novo Nordisk Inc., Novo Nordisk A/S. Sun Pharmaceutical Industries Inc. served on 3/7/2022, answer due 3/28/2022. (Egan, Brian) (Entered: 03/07/2022)
03/09/2022		Case Assigned to Judge Colm F. Connolly. Please include the initials of the Judge (CFC) after the case number on all documents filed. Associated Cases: 1:22-cv-00294-CFC through 1:22-cv-00299-CFC (rjb) (Entered: 03/09/2022)
03/16/2022	<u>8</u>	SUMMONS Returned Executed by Novo Nordisk Inc., Novo Nordisk A/S. Sun Pharmaceutical Industries Ltd. served on 3/9/2022, answer due 3/30/2022. (Egan, Brian) (Entered: 03/16/2022)
03/16/2022	<u>9</u>	STIPULATION TO EXTEND TIME for Sun Pharmaceutical Industries Ltd. and Sun Pharmaceutical Industries, Inc. to answer, move, or otherwise respond to Plaintiffs Complaint to May 9, 2022 – filed by Novo Nordisk A/S, Novo Nordisk Inc.. (Egan, Brian) (Entered: 03/16/2022)
03/17/2022		SO ORDERED, re <u>9</u> STIPULATION TO EXTEND TIME for Sun Pharmaceutical Industries Ltd. and Sun Pharmaceutical Industries, Inc. to answer, move, or otherwise respond to Plaintiffs Complaint to May 9, 2022, filed by Novo Nordisk A/S, Novo Nordisk Inc. Reset Answer Deadlines: Sun Pharmaceutical Industries Ltd. answer due 5/9/2022; Sun Pharmaceutical Industries Inc. answer due 5/9/2022. Ordered by Judge Colm F. Connolly on 3/17/2022. (kmd) (Entered: 03/17/2022)
05/06/2022	<u>10</u>	MOTION for Pro Hac Vice Appearance of Attorney Jeffrey J. Oelke, Ryan P. Johnson, Robert E. Counihan, Laura T. Moran, Erica R. Sutter, Kara Czekai, and Olivia Wheeling – filed by Novo Nordisk A/S, Novo Nordisk Inc.. (Egan, Brian) (Entered: 05/06/2022)
05/06/2022		SO ORDERED, re (15 in 1:22-cv-00298-CFC, 10 in 1:22-cv-00294-CFC, 13 in 1:22-cv-00297-CFC, 10 in 1:22-cv-00296-CFC, 9 in 1:22-cv-00299-CFC) MOTION for Pro Hac Vice Appearance of Attorney Jeffrey J. Oelke, Ryan P. Johnson, Robert E. Counihan, Laura T. Moran, Erica R. Sutter, Kara Czekai, and Olivia Wheeling, filed by Novo Nordisk A/S, Novo Nordisk Inc. Ordered by Judge Colm F. Connolly on 5/6/2022. Associated Cases: 1:22-cv-00294-CFC, 1:22-cv-00296-CFC, 1:22-cv-00297-CFC, 1:22-cv-00298-CFC, 1:22-cv-00299-CFC. (kmd) (Entered: 05/06/2022)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

NOVO NORDISK INC. and)	
NOVO NORDISK A/S,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. _____
)	
SUN PHARMACEUTICAL INDUSTRIES LTD.)	
and SUN PHARMACEUTICAL INDUSTRIES,)	
INC.,)	
)	
Defendants.)	

COMPLAINT

Novo Nordisk Inc. and Novo Nordisk A/S (collectively, “Novo Nordisk”), by their undersigned attorneys, for their Complaint against Defendants Sun Pharmaceutical Industries Ltd. and Sun Pharmaceutical Industries, Inc. (collectively, “Sun”), allege:

NATURE OF THE ACTION

1. This is an action for patent infringement under the patent laws of the United States, Title 35 of the United States Code, arising from Sun’s submission of an Abbreviated New Drug Application (“ANDA”) to the United States Food and Drug Administration (“FDA”), by which Sun seeks approval to market a generic version of Novo Nordisk’s pharmaceutical product Ozempic® prior to the expiration of United States Patent Nos. 9,132,239 (the “’239 patent”) and 10,335,462 (the “’462 patent”), which cover *inter alia*, Ozempic® and/or its use.

THE PARTIES

2. Plaintiff Novo Nordisk Inc. (“NNI”) is a corporation organized and existing under the laws of the State of Delaware, and has its principal place of business at 800 Scudders Mill Road, Plainsboro, New Jersey 08536.

3. Plaintiff Novo Nordisk A/S (“NNAS”) is an entity organized and existing under the laws of the Kingdom of Denmark, and has its principal place of business at Novo Allé, 2880 Bagsværd, Denmark. NNI is an indirect, wholly-owned subsidiary of NNAS.

4. On information and belief, Defendant Sun Pharmaceutical Industries Ltd. is a corporation organized and existing under the laws of India, having its principal place of business at Sun House, Plot No. 201 B/1, Western Express Highway, Goregaon (East), Mumbai, Maharashtra, India 400063. On information and belief, Sun Pharmaceutical Industries Ltd. is in the business of making and selling generic pharmaceutical products, which it distributes in the State of Delaware and throughout the United States.

5. On information and belief, Defendant Sun Pharmaceutical Industries, Inc. is a corporation organized and existing under the laws of the State of Delaware, having its principal place of business at 2 Independence Way, Princeton, New Jersey, 08540. On information and belief, Sun Pharmaceutical Industries, Inc. is in the business of making and selling generic pharmaceutical products, which it distributes in the State of Delaware and throughout the United States.

6. On information and belief, Defendant Sun Pharmaceutical Industries, Inc. is a wholly owned subsidiary of Defendant Sun Pharmaceutical Industries Ltd.

7. On information and belief, Defendants Sun Pharmaceutical Industries, Inc. and Sun Pharmaceutical Industries Ltd. acted in concert to prepare and submit ANDA No. 216478 (“Sun’s ANDA”) to the FDA.

8. On information and belief, following any FDA approval of Sun’s ANDA, Defendants Sun Pharmaceutical Industries, Inc. and Sun Pharmaceutical Industries Ltd. will act in concert to distribute and sell a generic version of semaglutide injection, for subcutaneous use,

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