

# Exhibit 3

PATENT

**U.S. District Court  
District of Delaware (Wilmington)  
CIVIL DOCKET FOR CASE #: 1:22-cv-00297-CFC**

Novo Nordisk Inc. et al v. Zydus Worldwide DMCC et al

Assigned to: Judge Colm F. Connolly

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

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

[1:22-cv-00296-CFC](#)

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

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

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

Date Filed: 03/04/2022

Jury Demand: None

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

Jurisdiction: Federal Question

Cause: 35:271 Patent Infringement

**Plaintiff**

**Novo Nordisk Inc.**

represented by **Jack B. Blumenfeld**  
Morris, Nichols, Arsht & Tunnell LLP  
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**LEAD ATTORNEY**  
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**ATTORNEY TO BE NOTICED**

**Plaintiff**

**Novo Nordisk A/S**

represented by **Jack B. Blumenfeld**  
(See above for address)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

**Brian P. Egan**  
(See above for address)  
**ATTORNEY TO BE NOTICED**

V.

**Defendant**

**Zydus Worldwide DMCC**

**Defendant**

**Zydus Pharmaceuticals (USA) Inc.**

**Defendant**

**Cadila Healthcare Ltd.**

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03/04/2022	<u>1</u>	COMPLAINT filed against Cadila Healthcare Ltd., Zydus Pharmaceuticals (USA) Inc., Zydus Worldwide DMCC – Magistrate Consent Notice to Pltf. ( Filing fee \$ 402, receipt number ADEDC-3817668.) – filed by Novo Nordisk Inc., Novo Nordisk A/S. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Civil Cover Sheet)(srs) (Entered: 03/04/2022)
03/04/2022	<u>2</u>	Notice, Consent and Referral forms re: U.S. Magistrate Judge jurisdiction. (srs) (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: 02/01/2022. Date of Expiration of Patent: U.S. Patent No. 9,132,239 expires 2/1/2032 and U.S. Patent No. 10,335,462 expires on 6/21/2033.Thirty Month Stay Deadline: 6/5/2025. (srs) (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. (srs) (Entered: 03/04/2022)
03/04/2022	<u>5</u>	Disclosure Statement pursuant to Rule 7.1: identifying Corporate Parent Novo A/S and Corporate Parent Novo Nordisk US Holdings, Inc. for Novo Nordisk Inc.; Corporate Parent Novo A/S for Novo Nordisk A/S – filed by Novo Nordisk A/S and Novo Nordisk Inc. (srs) (Entered: 03/04/2022)
03/04/2022	<u>6</u>	Summons Issued as to Zydus Worldwide DMCC on 3/4/2022. (srs) (Entered: 03/04/2022)
03/04/2022	<u>7</u>	Summons Issued as to Zydus Pharmaceuticals (USA) Inc. on 3/4/2022. (srs) (Entered: 03/04/2022)
03/04/2022	<u>8</u>	Summons Issued as to Cadila Healthcare Ltd. on 3/4/2022. (srs) (Entered: 03/04/2022)
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)
03/14/2022	<u>9</u>	WAIVER OF SERVICE returned executed by Novo Nordisk Inc., Novo Nordisk A/S: For Cadila Healthcare Ltd. waiver sent on 3/10/2022, answer due 5/9/2022. (Egan, Brian) (Entered: 03/14/2022)
03/14/2022	<u>10</u>	WAIVER OF SERVICE returned executed by Novo Nordisk Inc., Novo Nordisk A/S: For Zydus Worldwide DMCC waiver sent on 3/10/2022, answer due 5/9/2022. (Egan, Brian) (Entered: 03/14/2022)
03/14/2022	<u>11</u>	WAIVER OF SERVICE returned executed by Novo Nordisk Inc., Novo Nordisk A/S: For Zydus Pharmaceuticals (USA) Inc. waiver sent on 3/10/2022, answer due 5/9/2022. (Egan, Brian) (Entered: 03/14/2022)
03/14/2022	<u>12</u>	STIPULATION TO EXTEND TIME for Defendants Zydus Worldwide DMCC, Zydus Pharmaceuticals (USA) Inc. and Cadila Healthcare Ltd. 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: 03/14/2022)
03/14/2022		SO ORDERED, re <u>12</u> STIPULATION TO EXTEND TIME for Defendants Zydus Worldwide DMCC, Zydus Pharmaceuticals (USA) Inc. and Cadila Healthcare Ltd. to answer, move or otherwise respond to Plaintiffs Complaint to May 9, 2022, filed by Novo Nordisk A/S, Novo Nordisk Inc. Ordered by Judge Colm F. Connolly on 3/14/2022. (kmd) (Entered: 03/14/2022)
05/06/2022	<u>13</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-00299-CFC. (kmd) (Entered: 05/06/2022)
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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

NOVO NORDISK INC. and	)	
NOVO NORDISK A/S,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C.A. No. _____
	)	
ZYDUS WORLDWIDE DMCC, ZYDUS	)	
PHARMACEUTICALS (USA) INC. and	)	
CADILA HEALTHCARE LTD.,	)	
	)	
Defendants.	)	

**COMPLAINT**

Novo Nordisk Inc. and Novo Nordisk A/S (collectively, “Novo Nordisk”), by their undersigned attorneys, for their Complaint against Defendants Zydus Worldwide DMCC, Zydus Pharmaceuticals (USA) Inc., and Cadila Healthcare Ltd. (collectively, “Zydus”), 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 Zydus’s submission of an Abbreviated New Drug Application (“ANDA”) to the United States Food and Drug Administration (“FDA”), by which Zydus 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.

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