

Exhibit 27

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA
CLARKSBURG DIVISION**

REGENERON PHARMACEUTICALS, INC.,

Plaintiff,

v.

MYLAN PHARMACEUTICALS INC.,

Defendant.

Case No. 1:22-cv-00061-TSK

**CONFIDENTIAL – SUBJECT TO
PROTECTIVE ORDER**

**REGENERON PHARMACEUTICALS, INC.’S OBJECTIONS AND RESPONSES TO
DEFENDANT’S FIRST SET OF INTERROGATORIES (NOS. 1–17)**

Pursuant to Rules 33 of the Federal Rules of Civil Procedure and Rule 33.01 of the Local Rules of Civil Procedure, Plaintiff Regeneron Pharmaceuticals, Inc. (“Plaintiff” and/or “Regeneron”), by and through its counsel, hereby submits the following objections and responses to Defendant Mylan Pharmaceuticals Inc.’s (“Defendant” and/or “Mylan”) First Set of Interrogatories (Nos. 1–17) (“Interrogatories”).

These objections and responses are based on information currently available and without prejudice to Regeneron’s right to produce evidence of any subsequently discovered fact or information, to add, modify, or otherwise change, amend, or supplement its responses as appropriate or to correct any inadvertent errors, mistakes, or omissions.

GENERAL OBJECTIONS

1. Regeneron incorporates by reference these General Objections into each and every specific response below. A specific response may repeat a General Objection for emphasis or for other reasons. The omission of any General Objection in any specific response to an Interrogatory is not intended to be and should not be construed as a waiver or limitation of any

General Objection to that response.

2. Regeneron objects to the Instructions and Definitions to the extent that they seek to impose on Regeneron any requirement or discovery obligation greater or different than those imposed by the Court, the Federal Rules of Civil Procedure, or the Local Rules of the United States District Court for the Northern District of West Virginia (collectively, the “Rules”).

3. Regeneron objects to each Interrogatory to the extent that it seeks information (including electronically stored information) or documents that are already in the possession, custody, or control of Defendant or counsel for Defendant, or to the extent that it seeks information or documents that are in the public domain and would be no more burdensome for Defendant to obtain than for Regeneron to obtain. Unless otherwise specifically indicated below, Regeneron will not produce any such information or documents.

4. Regeneron objects to each Interrogatory to the extent that it seeks any document or electronically stored information that is not within the possession, custody, or control of Regeneron.

5. Regeneron objects to producing documents in response to any Interrogatories or any parts of Interrogatories relating to patents not currently at issue in the litigation, as set forth in the Court’s Scheduling Order of October 25, 2022 (ECF No. 87), and Regeneron’s Stipulation Regarding Case Narrowing and Injunctive Relief of October 28, 2022 (ECF No. 88). Regeneron only will produce documents in response to Interrogatories or parts of Interrogatories to the extent they relate to the Initial Patents currently at issue in the litigation.

6. Regeneron objects to each Interrogatory to the extent that it seeks “each” or “any” or “all” documents and electronically stored information responsive to the Request. Such

demands are unduly burdensome and overly broad, and they seek documents and electronically stored information that are not relevant to the claims or defenses of any party nor proportional to the needs of the case. Regeneron will consider as responsive to any Interrogatory that seeks documents or things “concerning,” “reflecting,” “regarding,” or “relating” (or similar language) to a designated subject only those documents or things that discuss the subject on their face. Regeneron has undertaken a substantial document collection and review, the parameters of which are described in Exhibit A to Regeneron’s Objections and Responses to Mylan’s First Requests for Production (Nov. 2, 2022), in which Regeneron noted it stands ready to work cooperatively with Mylan regarding the provision of additional information that is relevant and proportionate to the needs of the case. With respect to any other searches and review to which the parties agree, Regeneron will conduct such searches and review based on Regeneron’s assessment of the locations most likely to contain documents in any additional agreed categories.

7. In furnishing these objections and responses to these Interrogatories and in producing documents and electronically stored information in response to these Interrogatories, Regeneron does not admit or concede the relevance, materiality, authenticity, or admissibility in evidence of any such request, document, or electronically stored information. All objections to the use, at trial or otherwise, of any document produced or information provided in response to the Interrogatories are hereby expressly reserved.

8. Regeneron objects to each Interrogatory to the extent that it uses language incorporating or calling for a legal conclusion or making an erroneous statement of law. By incorporating the need to make a legal conclusion or erroneous statement of law, such Interrogatories are vague and ambiguous. Such Interrogatories also intrude upon the attorney work product protection by seeking an identification of the information that counsel believes

satisfies the legal contention. Regeneron's responses herein shall be as to matters of fact only, and shall not be construed as stating or implying any conclusions of law concerning the matters referenced in any Interrogatory or concerning any matter relevant to this litigation.

9. Regeneron objects to each Interrogatory to the extent that it prematurely seeks production of information to be provided during expert discovery. Regeneron will not prematurely produce documents or information that are to be provided during expert discovery, but will only produce such documents and information in accordance with the Court's schedule for expert discovery.

10. Regeneron objects to each Interrogatory to the extent that it calls for the production of documents or disclosure of electronically stored information protected by any privilege, including, without limitation, the attorney-client privilege, the work product doctrine, the common interest privilege, or any other available and valid grounds for withholding documents and electronically stored information from production. Regeneron will not produce such privileged documents or information—all Interrogatories have been read to exclude the discovery and/or production of such privileged information and documents, and any indication by Regeneron that it will produce documents or electronically stored information, including in these responses, shall be read to exclude the production of such privileged documents and information.

11. Regeneron objects to each Interrogatory to the extent that it seeks information or documents containing private, confidential, secret, trade secret, proprietary, and/or sensitive business information of Regeneron, its employees, and/or third parties (hereinafter referred to as "Confidential Information"). Regeneron will only disclose Confidential Information, including trade secret, proprietary, personal, commercially sensitive, third-party confidential, or other

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