EXHIBIT A
DEFINITIONS

1. The term "document" is used in a comprehensive sense as set forth in Fed. R. Civ. P. 34(a) and means all written or graphic matter, however produced or reproduced, in Genentech's actual or constructive possession, custody, care or control, including without limitation, originals (or copies where originals are unavailable) of correspondence, e-mail, computer storage media, computer software needed to produce in human-readable form from said computer storage media, instructions for using said computer software, telegrams, notes of any type of personal or telephone conversations, or of meetings or conferences, minutes of directors or committee meetings, memoranda, inter-office communications, studies, analyses, reports, engineering drawings, results of investigations, catalogs, contracts, licenses, agreements, working papers, statistical records, ledgers, books of account, vouchers, invoices, charge slips, freight bills, time sheets or logs, stenographers' notebooks, diaries, or papers similar to any of the foregoing however denominated. "Documents" shall also include drafts of any of the foregoing however denominated. "Documents" shall also mean (1) any copy which is not identical to the original or to any other copy and (2) any tangible thing that is called for by or identified in response to a request for documents.

2. The term "concerning" means relating to, referring to, describing, evidencing, or constituting.

3. Something is "relating to" a subject if it makes a statement about, refers to, mentions, discusses, describes, reflects, deals with, consists of, constitutes, comprises, concerns, evidences, records, or in any way pertains to the subject, whether as a whole or in part, and either directly or indirectly.

4. The terms "and" and "or" shall be construed both conjunctively and disjunctively and the plural shall be construed as the singular, and vice versa, as necessary and in order to bring within the scope of these Requests any information, documents, or things that might otherwise be construed to be outside their scope.

5. The use of the singular form of any word includes the plural and vice versa.

6. The term "including" means including, without limitation.

7. The term "BLA" means Biologics License Application.

8. The term "PFS" means pre-filled syringe.

9. The term "Lucentis® PFS" means the brand ranibizumab PFS products for which Genentech, Inc. holds BLA No. 125156 in the United States, including any amendments or supplements thereto.

10. The term "Lucentis® PFS Packaging Tray" means the tray in which the Lucentis® PFS is packaged and sealed.

DOCUMENTS REQUESTED

1. Documents sufficient to show when the Lucentis® PFS first became commercially available.

2. Documents, for example from the Lucentis® BLA, sufficient to show, at the time that the Lucentis® PFS first became commercially available: (a) the size, composition, shape, and dimensions of all features on the Lucentis® PFS Packaging Tray (e.g., all geometric features, cavities, narrowed portions, projections, sidewalls, and packaging seal), (b) the configuration of the Lucentis® PFS Packaging Tray (e.g., the various states that the Lucentis® PFS Packaging Tray may be configured in), and (c) the terminal sterilization of the Lucentis® PFS Packaging Tray.

3. Documents showing any modifications to the Lucentis® PFS Packaging Tray and the timing of such modifications, after the Lucentis® PFS first became commercially available.