

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

PFIZER INC.,

Plaintiff,

v.

REGOR THERAPEUTICS INC., QILU
REGOR THERAPEUTICS INC., XIAYANG
QIU, MIN ZHONG, and DOES 1-10,

Defendants.

Civil Action No. 3:22-cv-190

JURY TRIAL DEMANDED

COMPLAINT

Plaintiff PFIZER INC. (“Pfizer”), through its undersigned attorneys, Davis Polk & Wardwell LLP and Wiggin and Dana LLP, as and for its Complaint against Defendants REGOR THERAPEUTICS INC., QILU REGOR THERAPEUTICS INC., XIAYANG QIU, MIN ZHONG, and DOES 1-10 (collectively, “Defendants”), respectfully alleges, upon knowledge and upon information and belief, as follows:

NATURE OF THE ACTION

1. Pfizer’s guiding principle is the pursuit of breakthroughs that change patients’ lives. Pfizer runs dozens of programs, from preclinical research and development through clinical trials to manufacturing and delivery of innovative, life-changing medicines. Some of these programs succeed while others do not; cutting-edge science requires significant trial and error, and sometimes programs can last many years before yielding a scientifically and commercially viable solution. But as Pfizer-BioNTech’s COVID-19 vaccine demonstrated, those solutions that are viable contribute to a better, healthier world for all.

2. One of Pfizer’s programs focuses on addressing two major American public-health crises: Type 2 diabetes and obesity. Tens of millions of Americans suffer from Type 2 diabetes, and tens of millions more Americans are considered “pre-diabetic” due to their increased risk of

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