

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

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GENENTECH, INC. and CITY OF HOPE,

Plaintiffs,

v.

AMGEN, INC.,

Defendant.

C.A. No. 18-924-CFC

**PUBLIC VERSION FILED: July 25, 2019**

**SUPPLEMENTAL DECLARATION OF NORA Q.E. PASSAMANECK IN SUPPORT OF  
PLAINTIFFS' EMERGENCY MOTION FOR A TEMPORARY RESTRAINING ORDER  
AND A PRELIMINARY INJUNCTION**

I, Nora Q.E. Passamaneck, declare and state as follows:

1. I am an attorney at Wilmer Cutler Pickering Hale and Dorr LLP, counsel for Genentech, Inc. ("Genentech") in Case No. 18-cv-00924-GMS (D. Del.). I am familiar with the facts set forth herein, and if called as a witness, I could and would testify competently to those facts under oath.

2. Attached hereto as Exhibit 230 is a true and correct copy of an excerpted version of United States Patent No. 6,627,196.

3. Attached hereto as Exhibit 231 is a true and correct copy of an excerpted version of a book titled, "Clinical Pharmacokinetics, Concepts and Applications, third ed.," by Malcolm Rowland & Thomas Tozer, which was submitted in IPR Exhibit No. IPR2017-01139 as Genentech Exhibit 2007.

4. Attached hereto as Exhibit 232 is a true and correct copy of an excerpted version of a book titled, "Pharmacokinetic and Pharmacodynamic Data Analysis: Concepts and

Applications,” by Johan Gabrielsson and Daniel Weiner, which was submitted in IPR Exhibit No. IPR2017-01139 as Genentech Exhibit 2006.

5. Attached hereto as Exhibit 233 is a true and correct copy of a June 18, 2019 email from counsel for Amgen, Orion Armon, to counsel for Genentech titled “Genentech, Inc et al. v. Amgen, Inc. (18-924-CFC): Deposition scheduling change.”

6. Attached hereto as Exhibit 234 is a true and correct copy of an excerpted version of the [REDACTED]. This exhibit is marked Confidential.

7. Attached hereto as Exhibit 235 is a true and correct copy of an excerpted version of the [REDACTED]. This exhibit is marked Confidential.

8. Attached hereto as Exhibit 236 is a true and correct copy of an excerpted version of the [REDACTED]. This exhibit is marked Confidential.

9. Attached hereto as Exhibit 237 is a true and correct copy of an excerpted version of the [REDACTED]. This exhibit is marked Confidential.

10. Attached hereto as Exhibit 238 is a true and correct copy of an excerpted version of the Sharon Baughman Deposition Transcript, dated May 9, 2019. This exhibit is marked Confidential.

11. Attached hereto as Exhibit 239 is a true and correct copy of an excerpted version of the Steven Shak Deposition Transcript, dated May 11, 2019. This exhibit is marked Confidential.

12. Attached hereto as Exhibit 240 is a true and correct copy of an excerpted version of the Larry Norton Deposition Transcript, dated June 17, 2019. This exhibit is marked Confidential.

13. Attached hereto as Exhibit 241 is a true and correct copy of an excerpted version of the Christy Oliger Deposition Transcript, dated June 14, 2019. This exhibit is marked Confidential.

14. Attached hereto as Exhibit 242 is a true and correct copy of an excerpted version of the Jennifer Glasgow Deposition Transcript, dated June 4, 2019. This exhibit is marked Confidential.

15. Attached hereto as Exhibit 243 is a true and correct copy of an excerpted version of Amgen's Opening Brief in Support of Motion for Permanent Injunctive Relief, in *Amgen Inc. et al. v. Sanofi et al.*, No. 14-cv-1317-SLR (D. Del. April 27, 2016), ECF No. 340.

16. Attached hereto as Exhibit 244 is a true and correct copy of a document titled, "[REDACTED] [REDACTED]," bearing Bates number GNE-HER\_002952248. This exhibit is marked Confidential.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

EXECUTED this 16<sup>th</sup> day of July, 2019.

By: /s/ Nora Q. E. Passamaneck  
Nora Q. E. Passamaneck