

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GENENTECH, INC. and CITY OF HOPE,)	
)	
Plaintiffs,)	C.A. No.: 17-1407-CFC-SRF
)	(CONSOLIDATED)
v.)	
)	
AMGEN INC.,)	
)	
Defendant.)	
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GENENTECH, INC.,)	
)	
Plaintiff,)	C.A. No.: 18-924-CFC-SRF
)	
v.)	
)	
AMGEN INC.,)	
)	
Defendant.)	

JOINT MOTION FOR TELECONFERENCE TO RESOLVE DISCOVERY DISPUTE

Plaintiffs Genentech, Inc. and City of Hope (“Plaintiffs”) and Defendant Amgen Inc. (“Amgen”) respectfully move this Court to schedule a teleconference to address the following outstanding disputes regarding a discovery matter:

- Plaintiffs’ production of unredacted third party settlement agreements and licenses
- Access to third party settlement agreements and licenses by Amgen’s *pro hac vice* admitted in-house counsel under the Protective Order

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a verbal meet-and-confer (by telephone) on December 19, 2019:

- Delaware Counsel – Alexandra Joyce and Daniel Silver for Plaintiffs; Neal Belgam and James Higgins for Amgen

- Lead Counsel –Andrew Danford and Eric Wiener for Plaintiffs; Amgen: Gourdin
Sirles for Amgen

The parties and third parties¹ are available for a teleconference on the following dates, if the Court has availability: January 9, 10, and 16. Because the clients and certain counsel are located on the West Coast, the parties and third parties respectfully request that a teleconference be scheduled in the afternoon on one of those days.

Dated: December 27, 2019

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¹ Counsel for the third parties also participated in the meet and confer.

IT IS SO ORDERED, this ____ day of _____, 20__.

United States Magistrate Judge