

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GENENTECH, INC.,

Plaintiff,

v.

AMGEN INC.,

Defendant.

C.A. No. 18-924-CFC-SRF

JOINT MOTION FOR TELECONFERENCE TO RESOLVE DISCOVERY DISPUTE

Plaintiff Genentech, Inc. (“Genentech”) and Defendant Amgen Inc. (“Amgen”) respectfully move this Court to schedule a teleconference to address the following unresolved dispute regarding a discovery matter:

- **Plaintiff’s refusal to designate a corporate witness to testify regarding Plaintiff’s statements in court filings and *inter partes* reviews regarding drivers of consumer demand and commercial success of Herceptin (Amgen’s 30(b)(6) Topics 50 and 51).**

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in verbal meet-and-confers by telephone on January 29, 2020 and January 31, 2020.

Delaware Counsel:

Daniel Silver for Genentech
Eve Ormerod for Amgen

Lead Counsel:

Andrew Danford and Jason Liss for Genentech
Orion Armon for Amgen

The parties are available for a teleconference on the following dates, if the Court has availability: February 14, 2020; February 19, 2020; and February 20, 2020.

MCCARTER & ENGLISH, LLP

/s/ Daniel M. Silver

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Attorneys for Defendant Amgen Inc.

Dated: February 5, 2020

SO ORDERED this ____ day of _____, 2020.

United States Magistrate Judge