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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION

SANOFI-AVENTIS U.S. LLC and REGENERON PHARMACEUTICALS, INC.,

Plaintiffs,

vs.

GENENTECH, INC., and CITY OF HOPE,

Defendants.

GENENTECH, INC., and CITY OF HOPE,

Counterclaim Plaintiffs,

vs.

SANOFI-AVENTIS U.S. LLC and REGENERON PHARMACEUTICALS, INC.,

Counterclaim Defendants.

Case No. 2:15-cv-05685-GW-AGR

DISCOVERY MATTER

DECLARATION OF LISA M. FERRI IN SUPPORT OF SUPPLEMENTAL MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFFS SANOFI-AVENTIS U.S. LLC AND REGENERON PHARMACEUTICALS, INC.'S MOTION TO COMPEL

Date: March 22, 2016
Time: 10:00 AM
Ctrm: B, 8th Floor, Spring Street
Judge: Alicia G. Rosenberg
Fact discovery cutoff: April 1, 2016
Pretrial Conference: Sept. 8, 2016
Trial: Sept. 27, 2016

I, Lisa M. Ferri, declare:

1. I am an attorney at Mayer Brown LLP, the law firm representing Plaintiffs sanofi-aventis U.S. LLC and Regeneron Pharmaceuticals, Inc. (collectively, "Plaintiffs") in the above captioned matter.

2. This declaration is based on my personal knowledge, and I would testify to the matters set forth in this Declaration if called upon as a witness.

3. Attached hereto as **Exhibit A [PROVISIONALLY FILED UNDER SEAL]** is a true and correct copy of an excerpt from the deposition transcript of Timothy Schwartz, dated March 1, 2016.

4. Attached hereto as **Exhibit B [PROVISIONALLY FILED UNDER SEAL]** is a true and correct copy of Exhibit 4A used in the March 1, 2016 deposition of Timothy Schwartz.

5. Attached hereto as **Exhibit C [PROVISIONALLY FILED UNDER SEAL]**is a true and correct copy of Exhibit 4B used in the March 1, 2016 deposition of Timothy Schwartz.

6. Attached hereto as **Exhibit D [PROVISIONALLY FILED UNDER SEAL]** is a true and correct copy of Exhibit 16 used in the March 1, 2016 deposition of Timothy Schwartz.

I declare under penalty of perjury that the following is true and correct.

Executed on March 8, 2016, at New York, New York.

By 

Lisa M. Ferri