IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

KING PHARMACEUTICALS RESEARCH AND DEVELOPMENT, INC., ASTELLAS US LLC, and ASTELLAS PHARMA US, INC. Plaintiffs, v. SICOR INC. AND SICOR PHARMACEUTICALS, INC., Defendants.	)	Civil Action No. 05-337 SLR

STIPULATION AND PROPOSED ORDER

WHEREAS plaintiffs King Pharmaceuticals Research and Development, Inc., Astellas US LLC and Astellas Pharma US, Inc. (collectively "Plaintiffs") and defendants Sicor Inc. and Sicor Pharmaceuticals, Inc. (collectively "Defendants") collectively seek and jointly request to extend the discovery deadlines set forth below, and

WHEREAS, in order to facilitate the just, speedy, and inexpensive determination of the litigation, the parties have agreed to extend certain dates that impact discovery between the parties but that do not impact the Court's schedule for claim construction or any other dates or deadlines set by the Court.

NOW, THEREFORE, IT IS STIPULATED AND AGREED, subject to the approval and order of the Court, that:

1. The deadline by which Defendants shall serve their initial expert report concerning invalidity and secondary factors concerning obviousness is extended through and including June 9, 2006.

2. The deadline by which Plaintiffs serve their rebuttal expert report(s) is extended through and including July 11, 2006.

3. The deadline by which Defendants shall serve their rebuttal expert report on secondary considerations regarding obviousness is extended through and including August 4, 2006.

4. The deadline by which Plaintiffs and Defendants shall conclude expert discovery is extended through and including September 29, 2006.

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SO ORDERED this _____ day of _____, 2006.

_____
United States District Judge