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 Plaintiffs shall serve their expert reports concerning validity is extended through and including July 20, 2006.

2. The deadline by which Defendants shall serve their rebuttal expert report(s) on secondary indicia is extended through and including August 25, 2006.

3. The deadline by which Plaintiffs and Defendants shall conclude expert discovery is extended through and including October 20, 2006.

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SO ORDERED this _____ day of July, 2006.

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The Honorable Sue L. Robinson