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

FIRST NOTICE OF RULE 30(b)(6) DEPOSITION OF KING PHARMACEUTICALS RESEARCH AND DEVELOPMENT

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6), Fed. R. Civ. P., on February 27, 2006, Defendants Sicor Inc. and Sicor Pharmaceuticals, Inc. (collectively "Sicor") will take the deposition upon oral examination of King Pharmaceuticals Research and Development, Inc. ("King"). The deposition will begin at 9:30 a.m. at the offices of Jones Day, located at 222 East 41st Street, New York, New York, and continue from day to day until completed.

King is requested and required pursuant to Rule 30(b)(6) to designate and make available to testify on its behalf at said deposition one or more officers, directors, managing agents, or other persons who consent and are knowledgeable on its behalf with respect to each of the subject matters set forth in Schedule A attached hereto.

The deposition shall be conducted before a notary public or other officer authorized to administer oaths. The deposition will be recorded stenographically and by video. You are invited to attend and cross-examine.

Dated: February 21, 2006

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Attorneys for Defendants Sicor Inc. and Sicor Pharmaceuticals, Inc.

SCHEDULE A

Definitions and Instructions

1. "The '877 patent" shall refer to U.S. Patent No. 5,070,877.

2. "The chain of applications that led to the issuance of the '877 patent" shall refer to U.S. Application No. 330,156 and U.S. Application No. 231,217.

3. "The '156 application" shall refer to U.S. Application No. 330,156.

4. "The European Patent Application" shall refer European Patent Application No. 89303960.2.

5. "King" shall refer to King Pharmaceuticals Research and Development, Inc., its subsidiaries, affiliates, divisions, and corporate predecessors, whether owned wholly or only partially, and every present and former director, agent, employee, consultant, expert, attorney, representative, nominee, and all other persons acting or purporting to act on their behalf.

6. "Medco" shall refer to Medco Research, Inc., its subsidiaries, affiliates, divisions, and corporate predecessors, whether owned wholly or only partially, and every present and former director, agent, employee, consultant, expert, attorney, representative, nominee, and all other persons acting or purporting to act on their behalf.

7. "PTO" shall refer to the United States Patent and Trademark Office.

8. "Communication" shall mean any exchange or transmittal of information in the form of facts, ideas, inquiries, or otherwise, whether written, oral, electronic, or in any other form.

9. "Concerning" or "concern" shall mean referring to, describing, evidencing, or constituting.

10. The connectives "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

11. The use of the singular form of any word includes the plural and vice versa.

DEPOSITION TOPICS

1. The decision to file all applications in the chain of applications that led to the issuance of the '877 patent.

2. The prosecution of all applications in the chain of applications that led to the issuance of the '877 patent, including but not limited to all communications between or among Medco, King, the named inventors, and the PTO in connection therewith.

3. The decision to abandon any of the applications in the chain of applications that led to the issuance of the '877 patent.

4. Prior art search(es) or validity investigation(s) conducted in connection with the prosecution of the applications in the chain of applications that led to the issuance of the '877 patent.

5. The protest filed pursuant to 37 C.F.R. 1.291(a) during the prosecution of the '156 application, including but not limited to any analysis thereof and any responses thereto.

6. The prosecution of the European Patent Application, including but not limited to the withdrawal thereof.

7. Communications between or among King, Medco, the named inventor, and any third parties concerning the prosecution of any patent application concerning use of adenosine for vasodilation.

CERTIFICATE OF SERVICE

I, Monté T. Squire, Esquire, hereby certify that on February 21, 2006, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

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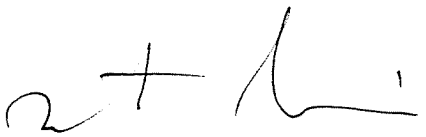
I further certify that on February 21, 2006, I caused copies of the foregoing document to be served by hand delivery and electronic mail on the above listed counsel of record and on the following in the manner indicated:

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