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.: 05-0337-SLR

Redacted Version - Publicly Filed

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

Of Counsel:

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Dated: February 27, 2006

SICOR'S OBJECTIONS TO THIRD NOTICE OF DEPOSITION OF SICOR INC. AND SICOR PHARMACEUTICALS, INC. PURSUANT TO FED. R. CIV. P. RULE 30(b)(6)

Defendants Sicor Inc. and Sicor Pharmaceuticals, Inc. (collectively "Sicor") hereby object to the February 9, 2006 Third Notice of Deposition of Sicor Inc. and Sicor Pharmaceuticals, Inc. as follows:

GENERAL OBJECTIONS

1. Sicor objects to each deposition topic to the extent that it seeks to impose requirements or obligations in addition to or different from those imposed by the Federal Rules of Civil Procedure or the Local Civil Rules of the United States District Court for the District of Delaware.

2. Sicor objects to each deposition topic to the extent it seeks to obtain information that is protected from discovery by the attorney-client privilege, the work product doctrine or by any other applicable immunity or privilege.

3. Sicor objects to each deposition topic to the extent that it calls for expert testimony.

4. Sicor objects to each deposition topic to the extent that it is duplicative of other discovery produced in this case, or of discovery which is more easily available through other, more appropriate and/or less-burdensome means.

5. Sicor objects to each deposition topic to the extent that it is vague and indefinite, overly broad, unduly burdensome or calls for testimony that is neither relevant to any issue in this action nor reasonably calculated to lead to the discovery of relevant or admissible evidence.

6. Sicor objects to each topic to the extent that it seeks legal analysis or conclusions.

7. Sicor's statement that it will produce a corporate designee for examination should not be construed to mean that Sicor has knowledge with respect to the topic at issue.

8. Sicor objects to Definition 1 to the extent that it seeks information not within Sicor's possession, custody or control and beyond the scope of Rule 30(b)(6), Fed. R. Civ. P.

9. Sicor objects to Definition 8 on the grounds that it is overly broad, vague, ambiguous and so expansive as to be virtually meaningless as it calls for, *inter alia*, anything "referring directly or indirectly to" "in any way" a given subject matter. Sicor shall construe "relating" as "referring to, describing, evidencing, or constituting."

10. Sicor objects to the noticed date of March 21, 2006 and states that a witness or witnesses will be made available on a mutually agreeable date.

SPECIFIC OBJECTIONS

Topic No. 1:

REDACTED

Objection to Topic No. 1:

REDACTED

Topic No. 2:

REDACTED

Objection to Topic No. 2:

REDACTED

Objection to Topic No. 3:

REDACTED

Topic No. 4:

REDACTED

Objection to Topic No. 4:

REDACTED

Topic No. 5:

REDACTED

Objection to Topic No. 5:

REDACTED

Topic No. 6:

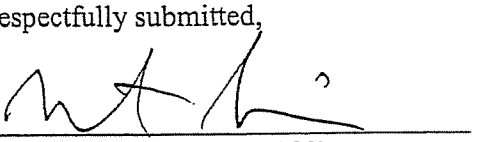
The factual bases for Sicor's denial of the averments of Paragraph 30 of the Complaint in this action.

Objection to Topic No. 6:

Sicor objects to this Topic to the extent that it seeks information protected from discovery by the attorney-client privilege and/or the work product doctrine. Sicor further objects to this Topic to the extent that it calls for information that is properly the subject of expert testimony.

Sicor also objects to this Topic to the extent that it calls for legal analysis, conclusions and/or testimony concerning Sicor's legal contentions.

Respectfully submitted,



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Dated: February 27, 2006

CERTIFICATE OF SERVICE

I, Monté T. Squire, Esquire, hereby certify that on February 27, 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 27, 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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Other Documents

1:05-cv-00337-SLR King Pharmaceuticals Research and Development, Inc. et al v. SICOR Inc. et al

U.S. District Court

District of Delaware

Notice of Electronic Filing

The following transaction was received from Squire, Monte entered on 2/27/2006 at 9:34 PM EST and filed on 2/27/2006

Case Name: King Pharmaceuticals Research and Development, Inc. et al v. SICOR Inc. et al
Case Number: 1:05-cv-337
Filer: SICOR Pharmaceuticals, Inc.
SICOR Inc.
Document Number: 57

Docket Text:
OBJECTIONS by SICOR Inc., SICOR Pharmaceuticals, Inc. to [41] Notice to Take Deposition, *of Sicor Pursuant to Fed. R. Civ. P. Rule 30(b)(6) - Third Notice [FILED UNDER SEAL]*. (Squire, Monte)

The following document(s) are associated with this transaction:

Document description: Main Document
Original filename:n/a
Electronic document Stamp:
[STAMP dcecfStamp_ID=1079733196 [Date=2/27/2006] [FileNumber=175426-0]
[53b600c10987fd2573bcd54bdde1bdd44e90839e074e58f96b7ed56a16b308df6c29
cbf53c52804e1aa6ec1dee9c6694dd44546db0e50449610a20e158d9beec]]

1:05-cv-337 Notice will be electronically mailed to:

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1:05-cv-337 Notice will be delivered by other means to:

CERTIFICATE OF SERVICE

I, Monté T. Squire, Esquire, hereby certify that on March 14, 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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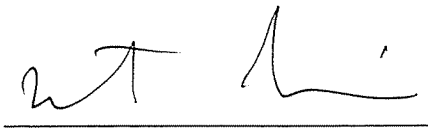
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