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.	)	Civil Action No. 05-337 SLR
SICOR INC. AND SICOR PHARMACEUTICALS, INC.,	)	
Defendants.	)	

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 and Defendants shall exchange expert reports on issues for which the parties have the burden of proof is extended through and including May 26, 2006.

2. The deadline by which Plaintiffs and Defendants shall exchange rebuttal expert reports is extended through and including June 23, 2006.

3. The deadline by which Plaintiffs and Defendants shall conclude expert discovery is extended through and including August 18, 2006.

4. The deadline by which Plaintiffs and Defendants shall respond to interrogatories and requests for admissions is extended through and including April 28, 2006.

5. The deadline by which Plaintiffs shall produce Final Infringement Contentions is extended through and including May 2, 2006.

6. The deadline by which Defendants shall produce Final Invalidity and Non-Infringement Contentions is extended through and including May 5, 2006.

7. The deadline by which Plaintiffs shall produce Final Validity Contentions is extended through and including May 12, 2006.

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SO ORDERED this _____ day of _____, 2006.

_____
United States District Judge