SCHEDULE B

List of Documents

DEFINITIONS

As used in this list, the following terms are to be interpreted in accordance with these definitions:

a. The term "document" shall have its customary broad sense to include written or graphic matter of every kind or description whether printed or reproduced by any process, or written and/or produced by hand, whether final or draft, original or reproduction, whether or not claimed to be privileged or otherwise exempt from discovery, however and by whomever prepared, produced, reproduced, disseminated or made, in your actual or constructive possession, custody, or control including, but not limited to:

(1) all writings, letters, correspondence, memoranda or summaries of telephone or personal conversations or interviews, microfilm, microfiche, telegrams, books, magazines, newspapers, advertisements, periodicals, bulletins, circulars, brochures, pamphlets, statements, notices, advertising layouts, trade letters, press releases, reports, rules, regulations, directives, teletype or telefax messages, e-mail correspondence and communications, minutes or records of meetings, interoffice communications, patents, copyrights, mask works, trade secrets, applications, assignments, contracts, agreements, legal instruments, vouchers, financial statements, ledgers, books of account, proposals, prospectuses, offers, orders, receipts, working papers, desk calendars, appointment books, diaries, routing slips, time sheets, logs, movie tapes, records, drawings, blue prints, sketches, plans, graphs, charts, photographs, data processing printouts and computations (both in existence and stored in memory), transcripts of oral statements or testimony, agreements, computer printouts, summaries or records or meetings or conferences, summaries of reports of investigations or negotiations, notebooks, sketches, maps, opinions or reports of consultants, slides, desk pads, invoices, credits, debits, checks, catalogs, worksheets, statistics, speeches and other writings, tape recordings, transcripts of tape recordings, any marginal comments or notes appearing on any documents, and all other writings or tangible things;

(2) originals of any document in whatever medium it may exist and all other copies not absolutely identical; and

(3) all drafts and notes (whether typed, handwritten, or otherwise) made or prepared in connection with such documents, whether used or not.

b. The term "person" means any natural person; proprietorship; partnership; firm; corporation; federal, state, and local government, including departments and agencies thereof; political subdivision; group; association; joint venture; bureau; or board of any other private, government or local entity.

c. The terms "you" and "your" shall refer to the Glaxo and any of its respective present and former directors, principles, officers, employees, agents, and representatives, and each person acting for, or purporting to act on its behalf.

d. The terms "affiliate," "affiliates" and phrases such as "or any of its affiliates," when stated in reference to a corporation, partnership, joint venture, firm, private organization or association, or other person or business entity refers to all parent, subsidiary or affiliate entities, their present and former officers, directors, shareholders, partners, employees, agents, attorneys, consultants, representatives, and all persons acting on behalf of such parent, subsidiary or affiliated entities, of which you are aware.

e. The term "communication" or "communications" shall mean any contact, oral or written, whether by correspondence, telephone, in person, or otherwise, formal or informal, at any time or place, under any circumstances, in any manner, whereby a statement of any nature is transmitted or transferred, including any meeting or conversation, and shall include, without limitation any documents containing, constituting, reflecting, memorializing, referring, or relating to any such contact.

f. As used in this Request, the singular form of a noun or pronoun shall be considered to include within its meaning the plural form of the noun or pronoun so used and vice-versa; and the use of any tense of any verb shall be considered to include also within its meaning all other tenses of the verb so used.

g. The term "and" and "or" shall be construed either conjunctively or disjunctively.

h. Whenever the term "all" is used herein, the term shall also be construed to mean "any" and "each" and vice-versa.

i. The terms "relate" and "relating," in addition to their natural meaning, shall also mean reflecting, containing, pertaining, referring, indicating, showing, evidencing, describing, discussing, mentioning, bearing upon, and/or comprising.

j. The phrase "in the possession, custody, or control" shall mean in the possession, custody, or control of you and your offices, principles, agents, representatives, employees, servants, and attorneys.

k. The term "GLAXO" shall refer to GlaxoSmithKline plc, as well as any and all of its predecessors, successors, subsidiaries and affiliates (including without limitation Laboratoire Glaxo Wellcome S.A., hereinafter "GLAXO (France)") and their respective agents, officers, directors, representatives, employees, affiliates, and/or authorized representatives.

l. The term "Lilly ICOS" shall refer to Lilly ICOS LLC, as well as any and all of its agents, officers, directors, principals, members, representatives, employees, affiliates, and/or authorized representatives.

m. The term "Vanderbilt Scientists" shall refer both collectively and individually to any

Vanderbilt researchers, assistants, scientists, including, but not limited to Jackie Corbin, Sharron Francis and Sekhar Raja Konjeti.

n. The term "Vanderbilt" shall refer to Plaintiff, The Vanderbilt University, as well as any and all of its agents, officers, directors, representatives, employees, affiliates, and/or authorized representatives.

o. The term "Complaint" shall refer to Vanderbilt's Complaint for Correction of Named Inventor on U.S. Patents Nos. 5,859,006 And 6,140,329, and any and all further amendments thereto.

p. The term "ICOS Answer" shall refer to the Answer filed by ICOS on September 9, 2005, and any and all amendments thereto.

q.

r. The term "006 Patent" means the United States Patent No. 5,859,006 issued on January 12, 1999.

s. The term "329 Patent" means the United States Patent No. 6,140,329 issued on January 12, 1999.

t. The term "the Patents" refers to both the "006 Patent" and the "329 Patent" unless the context clearly requires otherwise.

DOCUMENTS AND THINGS TO BE PRODUCED

1. All manuals or similar instructional materials relating to the installation and use of computer software employed at Glaxo from 1991 through 1994 in connection with the "Chem Base" database referenced in the deposition testimony of Drs. Pascal Grondin and Alain Daugan taken in connection with the above-captioned matter (the "Chem Base database").

2. All documents comprising, relating or pertaining to rules and protocols employed by Glaxo from 1991 through 1994 with respect to the use of the Chem Base database, including without limitation those relating to access and data entry.

3. All manuals or similar instructional materials relating to the installation and use of computer software employed at Glaxo from 1991 through 1994 in connection with the "Glaxdatabank" referenced in GLAX 02169 and GLAX 02170 (the "Glaxdatabank").

4. All documents comprising, relating or pertaining to rules and protocols employed by Glaxo from 1991 through 1994 with respect to the use of the Glaxdatabank, including without limitation those relating to access and data entry.

5. All manuals or similar instructional materials relating to the installation and use of computer software employed at Glaxo from 1991 through 1994 in connection with databases,

databanks, libraries or other compilations of SAR data, other than the Chem Base database and the Glaxdatabank, employed in connection with efforts to develop PDE V inhibitors.

6. All documents comprising, relating or pertaining to rules and protocols employed by Glaxo with respect to the use of databases, databanks, libraries or other compilations of SAR data, other than the Chem Base database and Glaxdatabank, employed in connection with efforts to develop PDE V inhibitors, including without limitation those relating to access and data entry privileges.

7. A load file of all data relating to compounds referenced in GLAX13938-15560 maintained on the ISIS database maintained by Glaxo.

8. All manuals or similar instructional materials relating to the installation and use of computer software employed at Glaxo from 1991 through 1994 in connection with the assignment of compound numbers to compounds.

9. All documents comprising, relating or pertaining to rules and protocols employed by Glaxo from 1991 through 1994 with respect to the assignment of compound numbers to compounds.

10. All documents reflecting the source and origin of each GLAX document that has been produced in connection with the above-captioned matter.

11. All documents reflecting information available through the Glaxdatabank from 1991 through 1994 regarding compounds that were tested during that period for inhibition of either human of bovine PDE V.

12. All documents reflecting Richard Labaudiniere's access or other use, from 1991 through 1994, of (i) the Chem Base database, (ii) the Glaxdatabank, and/or (iii) any other databases, databanks, libraries or other compilations of SAR data.

13. All documents reflecting Francois Hyafil's access or other use, from 1991 through 1994, of (i) the Chem Base database, (ii) the Glaxdatabank, and/or (iii) any other databases, databanks, libraries or other compilations of SAR data.

14. All documents reflecting Pascal Grondin's access or other use, from 1991 through 1994, of (i) the Chem Base database, (ii) the Glaxdatabank, and/or (iii) any other databases, databanks, libraries or other compilations of SAR data.

15. All documents reflecting Alain Daugan's access or other use, from 1991 through 1994, of (i) the Chem Base database, (ii) the Glaxdatabank, and/or (iii) any other databases, databanks, libraries or other compilations of SAR data.