Schedule A

1. The identity of and organizational/reporting structure for all individuals involved in the research, development, testing, product refinement, quality control, manufacture, distribution, sale, marketing or licensing of Teva's proposed lansoprazole delayed release capsules (15 and 30 mg), as described in Abbreviated New Drug Application ("ANDA") No. 77-255 ("ANDA Products").

2. Teva's decision to develop a generic lansoprazole product, including any comparisons to other substituted benzimidazole products including, but not limited to, omeprazole, esomeprazole, pantoprazole and/or rabeprazole, from a marketing, promotional, sales, efficacy, toxicity, biological activity and/or preference standpoint.

3. DMF No. 17551 submitted to FDA by Teva for lansoprazole as manufactured in Be'er Sheva, Israel.

4. ANDA No. 77-255, including, but not limited to, the chemistry, manufacturing and control sections.

5. All correspondence between Teva and FDA regarding ANDA No. 77-255 and DMF No. 17551, including, but not limited to, Teva's responses to FDA deficiency letters and the status of ANDA No. 77-255.

6. Teva's decision to prepare and file ANDA No. 77-255, including, but not limited to, the identification of all facts, documents, data, studies, investigations, opinions, and analyses that were considered by Teva in making its decision.

7. Teva's decision to amend ANDA No. 77-255 to include a certification under 21 U.S.C. § 355(j)(2)(A)(vii)(IV) (a "Paragraph IV certification") that, in Teva's opinion, U.S. Patent Nos. 4,628,098 ("the '098 patent"); 5,026,560 ("the '560 patent"); 5,045,321 ("the '321 patent"); 5,093,132 ("the '132 patent") and 5,433,959 ("the '959 patent") (collectively "the patents-in-suit") are invalid, unenforceable or will not be infringed by the commercial manufacture, use or sale of Teva's ANDA Products, including, but not limited to, the identification of all facts, documents, data, studies, investigations, opinions, and analyses that were considered by Teva in making its decision.

8. The identity and description of all facilities and equipment used to produce Teva's ANDA Products.

9. The research, evaluation, studies, tests, and other data or information leading to the development of Teva's ANDA Products.

10. The development, scale-up, commercial manufacture and testing of Teva's ANDA Products, including, but not limited to, bioequivalence testing, dissolution testing, stability studies, *in vivo* and *in vitro* tests, and test results and conclusions.

11. All studies, tests, data and information related to the stability, storage and handling of Teva's lansoprazole pellets used in Teva's ANDA Products.

12. The factual bases for and preparation of Teva's Notice Letter dated December 5, 2005, sent to Plaintiffs pursuant to 21 U.S.C. § 355(j)(2)(B) of the Federal Food Drug and Cosmetic Act, including, but not limited to, the identification of all facts, documents, data, studies, investigations, opinions, and analyses that were considered in preparing the Notice Letter.

13. The factual bases for Teva's contentions or beliefs that Teva's ANDA Products have not infringed, are not infringing and will not infringe, either literally or under the doctrine of equivalents, any valid and enforceable claim of the patents-in-suit, including, but not limited to, the identification of all facts, documents, data, studies, investigations, opinions, and analyses that support Teva's contentions or beliefs.

14. The factual bases for Teva's contentions or beliefs that the claims of the patents-in-suit are invalid for failure to comply with the requirements of the patent laws of the United States, including, without limitation, 35 U.S.C. §§ 101, 102, 103 and/or 112, including, but not limited to, all facts, documents, data, studies, investigations, opinions, and analyses that support Teva's contentions or beliefs.

15. Teva's patent application(s), whether filed in the U.S. under the Patent Cooperation Treaty, or in any other country, relating to Teva's ANDA Products.

16. Testing, calculations, analyses, statistical interpretation, and validation of stability studies on any lansoprazole delayed release capsule formulation considered by Teva, including, but not limited to, any formulation abandoned, contemplated, discussed, or proposed by or for Teva.

17. Formulation development reports, analyses, studies, and any other communication or information related to Teva's ANDA product or other lansoprazole delayed release capsule formulation considered by Teva, including, but not limited to, any formulation abandoned, contemplated, discussed, or proposed by or for Teva.

18. Teva's attempts to design around or not infringe the patents-in-suit.

19. Labeling for Teva's ANDA Product, including, but not limited to, the package insert and packaging label.

20. Forecasts, models, analyses, evaluations, and projections concerning sales of PREVACID®, Teva's ANDA Product or lansoprazole delayed release capsules (15 and 30 mg) in the United States.

21. Any agreements between Teva and any third parties regarding the development, manufacture, distribution, sales, or promotions of Teva's ANDA Products.

22. Any agreements between Teva and third parties related to this litigation, Teva's ANDA Product, or Plaintiffs' PREVACID® products.