IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ASTRAZENECA AB, AKTIEBOLAGET HÄSSLE, KBI-E, INC., KBI, INC. and ASTRAZENECA LP,	)	
Plaintiffs,	)	
v.	)	Civil Action No. 06-358 (SLR)
DEXCEL, LTD., DEXXON, LTD., DEXCEL PHARMA TECHNOLOGIES LTD. and CIPLA LTD,,	)	
Defendants.	)	

DEFENDANTS' MOTION TO LIFT THE STAY ON FDA APPROVAL OF DEXCEL PHARMA TECHNOLOGIES LTD.'S OMEPRAZOLE DELAYED-RELEASE TABLETS

Dexcel Ltd., Dexxon Ltd., and Dexcel Pharma Technologies Ltd. (collectively "Defendants") respectfully move the Court to lift the statutory 30-month stay on FDA approval at this time, because Astrazeneca AB, Aktiebolaget Hässle, KBI-E, Inc., KBI, Inc., and Astrazeneca LP (collectively "Plaintiffs") have failed to reasonably cooperate in expediting this action as required by statute. Defendants are today filing an opening brief and other supporting papers in support of this motion. Defendants are also moving to require Plaintiffs to respond to this motion on an accelerated schedule.

March 30, 2007

THE BAYARD FIRM

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ASTRAZENECA AB, AKTIEBOLAGET HÄSSLE, KBI-E, INC., KBI INC., and ASTRAZENECA LP, Plaintiffs,	)	
v.	)	C.A. No. 06-358 (SLR)
DEXCEL LTD., DEXXON LTD., DEXCEL PHARMA TECHNOLOGIES LTD., and CIPLA, LTD., Defendants.	)	

LOCAL RULE 7.1.1 CERTIFICATION

Pursuant to Local Rule 7.1.1, the undersigned states as follows:

(1) Defendants' Motion to Lift Stay is, in effect, a dispositive motion. Nonetheless, counsel for Defendants asked counsel for Plaintiffs if Plaintiffs would consent to the relief requested therein, and counsel for Plaintiffs have not responded in time for the timely filing of that motion.

(2) With respect to Defendants' Motion to Expedite Briefing, the essence of Defendants' Motion to Lift Stay, which is the subject of that motion to expedite, is that Plaintiffs have delayed the course of this litigation for their own economic benefit. Requesting Plaintiffs to shorten their own time to respond seemed to Defendants' counsel to be a futile gesture under the circumstances described in the Motion to Lift Stay.

March 30, 2007

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CERTIFICATE OF SERVICE

The undersigned counsel certifies that, on March 30, 2007, he electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will send automatic notification of the filing to the following:

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The undersigned counsel further certifies that, on March 30, 2007, copies of the foregoing document were sent by email and hand to the above local counsel and by email and first class mail to the following non-registered participant:

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