**IN THE UNITED STATES DISTRICT COURT**
**FOR THE DISTRICT OF DELAWARE**

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

**Declaration of Caryn Borg-Breen**

I, Caryn Borg-Breen, declare under the penalty of perjury that the following is true and correct:

1. I am an attorney with the law firm of Leydig, Voit & Mayer, Ltd. who is representing Dexcel Ltd., Dexxon Ltd., and Dexcel Pharma Technologies Ltd. (collectively "Defendants") in the above-captioned action.

2. This declaration is submitted in support of "DEFENDANTS' OPENING BRIEF IN SUPPORT OF THEIR MOTION TO LIFT THE STAY ON FDA APPROVAL OF DEXCEL PHARMA TECHNOLOGIES, LTD.'S OMEPRAZOLE DELAYED-RELEASE TABLETS."

3. On January 25, 2007, Defendants subpoenaed documents and FED. R. CIV. P. 30(b)(6) deponents from AAIpharma, Inc., and AAIpharma, LLC (collectively "AAIpharma").

4. On February 2, 2007, I spoke with Mr. James Gumina, counsel for AAIpharma, regarding the scope of the document requests. In our conversation, Mr. Gumina indicated that most of the documents Defendants' requested were sitting in his office, and that he needed to

check with his client regarding a few requests, but expected he could produce the documents by the end of February.

5. On February 14, 2007, Mr. Gumina corresponded to clarify his understanding of which documents Defendants requested.

6. On February 22, 2007, Defendants' responded that Mr. Gumina properly identified the documents Defendants sought produced.

7. On March 13, 2007, Defendants telephoned and left a voice message for Mr. Gumina regarding the status of AAIpharma's document production. Mr. Gumina never returned Defendants' phone call.

8. I hereby declare that all statements made herein of my own knowledge are true, that all statements of opinion or those made on information and belief are believed to be true, that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Title 18 of the United States Code.

**DATE:** 3/29/07

Caryn Borg-Breen