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 DEXCEL PHARMA TECHNOLOGIES,	)	
Defendants.	)	

PLAINTIFF ASTRAZENECA'S NOTICE OF 30(b)(6) DEPOSITION OF DPT LTD. ON JURISDICTIONAL ISSUES

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiffs AstraZeneca AB, Aktiebolaget Hässle, KBI Inc., KBI-E Inc. and AstraZeneca LP (collectively "AstraZeneca") will take the deposition of Defendant Dexcel Pharma Technologies Ltd. ("DPT Ltd."), upon oral examination, as if upon cross examination, before a notary public or other officer authorized by law to administer oaths, and recorded by stenographic means and on videotape, at the offices of Morris, Nichols, Arsht & Tunnell LLP, 1201 N. Market Street, Wilmington, DE 19899-1347, on September 27, 2006 at 9:00 a.m. The deposition shall continue day-to-day until completed. The deposition shall proceed upon the matters described in Appendix "A." DPT Ltd. is requested to designate one or more persons to testify on its behalf with regard to the knowledge known or reasonably available to DPT Ltd. that pertains to the matters identified.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Jack B. Blumenfeld

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August 31, 2006

APPENDIX A

DEFINITIONS

A. "DPT Ltd." means Dexcel Pharma Technologies, Ltd., and further includes any parent, affiliate, predecessor, successor, subsidiary or division thereof, present and former directors, agents, representatives, executives, officers, employees, attorneys or any other person acting or purporting to act on behalf of Dexcel Pharma Technologies, Ltd.

B. "Dexcel Entity" means Dexcel Pharma Technologies, Ltd., Dexxon Ltd., Dexcel Ltd, Dexcel Pharma, Inc., and further includes any parent, affiliate, predecessor, successor, subsidiary or division thereof, present and former directors, agents, representatives, executives, officers, employees, attorneys or any other person acting or purporting to act on behalf of Dexcel Pharma Technologies, Ltd.

C. "Defendants" means DPT Ltd., Dexcel Ltd., Dexxon Ltd. and Dexcel Pharma Technologies.

D. "Product" means any product, manufactured good, merchandise or item for consumption that is identified as available in the United States by Dexcel's web site, www.dexcel.com (i.e. PerioChip®; Xantia®; Xantia® Professional; Diclofenac Sodium ER; ISMN ER), or any other product sold or distributed in the United States directly or indirectly by any Dexcel Entity.

E. "NDA Product" means the omeprazole product that is subject to New Drug Application ("NDA") NDA No. 22-032 that, if approved by the Food and Drug Administration ("FDA"), is intended to be sold in the United States.

TOPICS FOR DEPOSITION

1. The identity of all directors, owners, officers, employees, shareholders, or any person with ownership interest in each Dexcel Entity from its inception to present.

2. The identity and location of any real or personal property or other assets located in the United States and owned by each Dexcel Entity from its inception to present.

3. The capital structure and sources of funding for each Dexcel Entity from its inception to present.

4. All filings or other such documents filed by any Dexcel Entity with any State or Commonwealth of the United States, or agency thereof, or with any United States federal agency, including any corporate resolutions, articles of incorporation, bylaws, licenses or documents reflecting authorization to do business in any jurisdiction in the United States.

5. The identity of all participants and researchers involved in the development of any NDA Product or involved in the preparation and writing of NDA No. 22-032, and the location of all studies, trials, and laboratory work cited in or relied upon in NDA No. 22-032.

6. All agreements and plans reflecting the intended manufacture, distribution and sale of any NDA Product in the United States.

7. The identity of all Products sold in the United States, and total sales and revenues for such Products in the United States and in the State of Delaware.

8. The identity of all manufacturers of any Product sold in the United States.

9. The identity of all purchasers, distributors, or sales agents of all Products

sold in the United States, and all agreements and correspondence with such purchasers, distributors or sales agents relating to all such Products.

10. The channels of distribution and sale of all Products in the United States including the importation, port of entry, chain of title, distribution, shipment and sale within the United States of each such Product.

11. The advertising, promotion, and marketing of all Products sold in the United States.

12. All correspondence with any customer or potential customer, end user or potential end user, of any Product sold in the United States, including any correspondence originating from any web site owned, maintained or affiliated with Defendant.

13. The identity of all customers and end users of all Products in the United States and in the State of Delaware.

14. The relationship of Mr. Dan Oren, or any relative or friend of Dan Oren, to each Dexcel Entity.

15. The reasons for establishing a place of business at Wainwright Building, 229 West Butte Street, Suite 407, Norfolk, Virginia 23510 (hereinafter "the Virginia address").

16. The nature of the business conducted at the Virginia address as of May 30, 2006 and at times before and after such date, including the property kept at such location and the identity of all employees at such location and the duties, if any, of such employees.

17. The date of establishment of the business at the Virginia address.

18. The establishment and maintenance of the websites www.dexcel.com, www.myxantia.com, and www.periochip.com and the reasons for any changes made to such sites.

19. The corporate status, business locations, and nature of the business conducted by each Dexcel Entity.

20. The identity and nature of any business contacts between any Dexcel Entity and the State of Delaware.

21. The identity and nature of any business contacts between any Dexcel Entity and the Commonwealth of Virginia.

CERTIFICATE OF SERVICE

I hereby certify that on August 31, 2006, I electronically filed the foregoing with the Clerk of the Court using CM/ECF, which will send notification of such filing to Richard D. Kirk.

I further certify that I caused to be served copies of the foregoing document on August 31, 2006 upon the following in the manner indicated:

BY HAND

Richard D. Kirk
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BY FEDERAL EXPRESS

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