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.	)	

PLAINTIFFS' REPLY TO DEFENDANT
DEXCEL PHARMA TECHNOLOGIES LTD.'S COUNTERCLAIM

Plaintiffs AstraZeneca AB, Aktiebolaget Hässle, KBI-E, Inc., KBI Inc., and AstraZeneca LP ("AstraZeneca") hereby reply to the counterclaim of Defendant Dexcel Pharma Technologies, Ltd. (hereinafter "DPT Ltd." or "Defendant").

To the extent any of paragraphs 1-64 of Defendant's Answer is determined in whole or in part to state counterclaims or the basis for counterclaims, each and every one of the allegations contained therein is denied, except to the extent admitted in AstraZeneca's responses in paragraphs 1-19 below.

To the extent any of paragraphs 65-67 of Defendant's Affirmative Defenses are determined to state counterclaims, each and every one of the allegations contained therein is denied, except to the extent admitted in AstraZeneca's responses in paragraphs 1-19 below.

To the extent any of Defendant's Request for Relief (A)-(F) is determined to state counterclaims, each and every one of the allegations contained therein is denied, except to the extent admitted in AstraZeneca's responses in paragraphs 1-19 below.

THE PARTIES

1. Other than the information set forth in AstraZeneca's amended complaint paragraph 16, AstraZeneca is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 1 and therefore denies the same.

2. AstraZeneca admits the allegations contained in paragraph 2.

3. AstraZeneca admits the allegations contained in paragraph 3.

4. AstraZeneca admits the allegations contained in paragraph 4.

JURISDICTION AND VENUE

5. AstraZeneca admits that this action purports to arise under the patent laws of the United States, Title 35 of the United States Code. The remaining allegations in this paragraph constitute conclusions of law and Defendant's characterization of the case, to which no answer is required; to the extent that they may be deemed allegations of fact, AstraZeneca denies the remaining allegations in paragraph 5.

6. AstraZeneca admits that Defendant alleges that this Court has jurisdiction of this counterclaim pursuant to 28 U.S.C. §§ 1331, 1338(a), 1391(b), 1400(b), and 28 U.S.C. §§2201 and 2202. AstraZeneca denies the remaining allegations of paragraph 6.

7. AstraZeneca admits the allegations contained in paragraph 7.

8. AstraZeneca admits the allegations contained in paragraph 8.

9. AstraZeneca admits the allegations contained in paragraph 9.

10. AstraZeneca admits that there is an actual, substantial, and continuing justiciable case or controversy between DPT Ltd. and AstraZeneca, but otherwise denies the allegations contained in paragraph 10.

COUNTERCLAIM FOR DECLARATORY JUDGMENT OF NON-INFRINGEMENT AND INVALIDITY

11. AstraZeneca repeats and incorporates by reference its replies to the allegations set forth in paragraphs 1-10 of the counterclaim.

12. AstraZeneca admits the allegations contained in paragraph 12, except to the extent that the '380 patent was issued to, *inter alia*, Gunnel Sundén, not "Funnel" Sundén.

13. AstraZeneca admits the allegations contained in paragraph 13.

14. AstraZeneca admits the allegations contained in paragraph 14, except to the extent that the '505 and '230 patents were issued to, *inter alia*, Minoru Oda, not "Miaora" Oda.

15. AstraZeneca admits the allegations contained in paragraph 15.

16. AstraZeneca denies the allegations contained in paragraph 16.

17. AstraZeneca denies the allegations contained in paragraph 17.

18. AstraZeneca denies the allegations contained in paragraph 18.

19. AstraZeneca admits that unless DPT Ltd.'s Tablets are found not to infringe the claims of the '380, '505, and '230 patents, or unless the patent claims are adjudged invalid, DPT Ltd. will be prohibited from commercially marketing its Tablets, but otherwise denies the allegations contained in paragraph 19.

PRAYER FOR RELIEF

WHEREFORE, AstraZeneca prays that:

(a) No relief issue to DPT, Ltd. on its counterclaim;

(b) No attorneys fees or costs be awarded to DPT, Ltd.;

(c) Attorneys fees or costs be awarded to AstraZeneca; and

(d) The Court award such other relief as it may deem proper.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

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February 14, 2007

CERTIFICATE OF SERVICE

I hereby certify that on February 14, 2007, 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 February 14, 2007 upon the following in the manner indicated:

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