IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ELAN PHARMA INTERNATIONAL LIMITED, Plaintiff, v. ABRAXIS BIOSCIENCE, INC., Defendant.	)	C.A. No. 06-438-GMS

PLAINTIFF ELAN PHARMA INTERNATIONAL LIMITED'S NOTICE OF RULE 30(b)(6) DEPOSITION OF ABRAXIS BIOSCIENCE, INC.

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 30(b)(6), Elan Pharma International Limited ("Elan") will take the continuing deposition by oral testimony of Defendant Abraxis Bioscience, Inc. ("Abraxis"), through one or more of its officers, directors, managing agents, or other persons consenting to testify on the matters listed on Attachment A.

The deposition shall take place at the offices of Esquire Deposition Services, 6222 Wilshire Blvd, 2nd FL, Los Angeles, California 90048 on June 1, 2007 at 9:00 a.m. PST, or at such other place, date and time mutually agreed upon or ordered by the Court, before a notary public or other officer authorized to administer oaths. The testimony shall be recorded by stenographic and/or video graphic means and shall continue from day to day until completed.

At least seven days before the deposition, Abraxis is requested to produce to undersigned counsel a list of proposed witnesses for each topic identified in Attachment A.

ASHBY & GEDDES

/s/ *Lauren E. Maguire*

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Dated: May 16, 2007
180604.1

ATTACHMENT A

DEFINITIONS

1. As used herein, "Abraxis," "Abraxis Bioscience," "Abraxis," "you," or "your" shall refer to Defendant Abraxis Bioscience, Inc., and any present or former parent, subsidiary, department, division, subdivision, branch, affiliate, predecessor, successors-in-interest, or other related company, any consultant, or representative of Abraxis Bioscience, Inc., and any other person acting on or purporting to act on its behalf.

2. As used herein, the term "Abraxane®" shall mean the human serum albumin-bound paclitaxel product that is sold by Abraxis.

3. As used herein, the terms "all," "any" or "each" shall be construed as any, all, and each inclusively.

SUBJECT MATTER

1. The joint sales meeting between Astra Zeneca and Abraxis relating to Abraxane®, which took place in December 2006 in Pittsburgh, Pennsylvania.

2. The identities of those attending the joint sales meeting between Astra Zeneca and Abraxis relating to Abraxane®, which took place in December 2006 in Pittsburgh, Pennsylvania.

3. The fees paid oncologists who attended the joint sales meeting between Astra Zeneca and Abraxis relating to Abraxane®, which took place in December 2006 in Pittsburgh, Pennsylvania.

4. Abraxis's investigation into allegations that Abraxis employees promoted off-label use of Abraxane® at the joint sales meeting between Astra Zeneca and Abraxis, which took place in December 2006 in Pittsburgh, Pennsylvania.

5. The results of any Abraxis investigation into allegations that Abraxis employees promoted off-label use of Abraxane® at the joint sales meeting between Astra Zeneca and Abraxis, which took place in December 2006 in Pittsburgh, Pennsylvania.

6. Identification of all published articles for which Abraxis purchased reprints to be used in responding to physician inquiries about Abraxane®.