UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ELAN PHARMA INTERNATIONAL LIMITED, Plaintiff, v. ABRAXIS BIOSCIENCE, INC., Defendant.	Civil Action No. 06-438-GMS **REDACTED - PUBLIC VERSION**

DECLARATION OF RICHARD E. MAROUN IN SUPPORT OF DEFENDANT ABRAXIS BIOSCIENCE, INC.'S MOTION FOR PROTECTIVE ORDER AGAINST THE DEPOSITIONS OF DRS. PATRICK SOON-SHIONG AND NEIL DESAI

I, Richard E. Maroun, declare as follows:

1. I am the Chief Administrative Officer, General Counsel and Corporate Secretary for Abraxis BioScience, Inc. ("Abraxis"), defendant in the above-referenced action. I make this declaration in support of Abraxis's Motion for Protective Order. I have personal knowledge of the matters set forth herein or, where indicated, am informed and believe that they are true, and if called upon to do so, I could and would competently testify to them.

2. I understand that plaintiff Elan Pharma International Limited ("Elan") originally noticed Dr. Neil Desai's deposition for July 19, 2007, a date on which I understand he was available and intended to testify. Accordingly, on July 17 and 18, Dr. Desai met with Emily Evans, Brigitte Hajos, and Diana Kruze of Morrison & Foerster LLP, counsel for Abraxis, to prepare for the deposition. During Dr. Desai's meeting on July 18, the day before the deposition was scheduled to take place, Ms. Evans informed him that Elan had canceled the deposition the night before.

3. I understand that Elan re-noticed Dr. Desai's deposition for August 8, 2007. [redacted]

[redacted]

[redacted]

4. [redacted]

[redacted]

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 8th day of August, 2007 in Los Angeles, California.

Richard E. Maroun

CERTIFICATE OF SERVICE

I, Elena C. Norman, Esquire, hereby certify that on August 20, 2007, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

Steven J. Balick, Esquire
ASHBY & GEDDES
500 Delaware Avenue, 8th Floor
Wilmington, DE 19801

I further certify that on August 20, 2007, I caused a true and correct copy of the foregoing document to be served by e-mail on the above-listed counsel of record and on the following non-registered participants in the manner indicated:

BY E-MAIL

Linda Glover, Esquire
Stephen Scheve, Esquire
BAKER BOTTS L.L.P.
One Shell Plaza
910 Louisiana Street
Houston, TX 77002-4995
steve.scheve@bakerbotts.com

Paul F. Fehlner, Esquire
BAKER BOTTS L.L.P.
30 Rockefeller Plaza
New York, NY 10112-4498
paul.fehlner@bakerbotts.com

William J. Sipio, Esquire
1375 Brentwood Road
Yardley, PA 19067
sipz25@aol.cm

YOUNG CONAWAY STARGATT
& TAYLOR, LLP

/s/ Elena C. Norman

Josy W. Ingersoll (No. 1088)
jingersoll@ycst.com
Elena C. Norman (No. 4780)
enorman@ycst.com
Karen E. Keller (No. 4489)
kkeller@ycst.com
The Brandywine Building
1000 West Street, 17th Floor
Wilmington, Delaware 19899
(302) 571-6600

Attorneys for Defendant
ABRAXIS BIOSCIENCE, INC.

EXHIBIT A

REDACTED IN ITS ENTIRETY