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September 13, 2007

The Honorable Leonard P. Stark
United States District Court
844 N. King Street
Wilmington, DE 19801

VIA ELECTRONIC FILING

Re: *Elan Pharma International, Ltd. v. Abraxis Bioscience, Inc.*
C.A. No. 06-438-GMS

Dear Judge Stark:

Pursuant to Local Rule 7.1.4, plaintiff Elan Pharma International, Ltd. respectfully requests that the Court hear oral argument on all pending discovery motions in this matter. Those motions include: (A) seven motions filed by defendant Abraxis Bioscience, Inc. – (i) Motion to Compel Responses to Interrogatories and Production of Documents Referring to Abraxis or Abraxane (D.I. 234), (ii) Motion to Compel Production of Withheld and/or Unredacted Versions of Documents Created by of for Third Parties (D.I. 237), (iii) Motion to Compel Production of Damages Discovery (D.I. 240), (iv) Motion for Protective Order Against the Depositions of Drs. Patrick Soon-Shiong and Neil Desai (D.I. 247), (v) Motion for Protective Order Against Plaintiff Elan Pharma International, Ltd.'s Notice of Rule 30(b)(6) Deposition (D.I. 252), (vi) Further Motion to Compel Production of Damages Discovery (D.I. 256), and (vii) Motion to Compel Responses to Abraxis's Fourth Set of Interrogatories (D.I. 259); (B) three cross-motions filed by plaintiff – (i) Cross-Motion to Limit by Protective Order Defendant's Fed.R.Civ.P. 30(b)(6) Deposition of Plaintiff (D.I. 288), (ii) Cross-Motion to Compel the Depositions of Drs. Soon-Shiong and Desai (D.I. 296) and (iii) Cross-Motion to Compel Rule 30(b)(6) Deposition of Abraxis Bioscience, Inc. (D.I. 304); and (C) plaintiff's Motion To: (1) Compel the Wrongfully-Terminated Deposition of Dr. Hawkins; and (2) Recover Costs for Abraxis's Obstruction of Rule 30(b)(6) Deposition (D.I. 334).

Respectfully,

/s/ *Lauren E. Maguire*

Lauren E. Maguire (I.D. #4261)

LEM: nml
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