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February 14, 2007

The Honorable Gregory M. Sleet
United States District Court
844 North 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 Sleet:

In anticipation of the discovery teleconference scheduled for February 16 at 11 a.m. EST in the above-captioned matter, the parties jointly submit the following items to be presented to the Court:

Plaintiff's Issues:

1. Plaintiff seeks an order compelling Defendant to produce documents regarding the manufacturing processes for Abraxane®, which would be responsive to Elan's Request for Production Nos. 1, 2, 4, 17, and 18.

2. Plaintiff seeks an order compelling Defendant to produce post FDA approval documents regarding Abraxane®, which would be responsive to Plaintiff's Request for Production Nos. 1, 2, 4, 5, 6, 8, 17 and 18, 19, 20, and 21.

3. Plaintiff seeks an order compelling Defendant to produce internal documents regarding the sale, marketing and distribution of Abraxane®, which would be responsive to Plaintiff's Request for Production Nos. 7, 26, and 30.

4. Plaintiff seeks an order compelling Defendant to identify:

   (a) the Morrison Foerster attorneys, patent agents, law clerks, legal assistants, scientific advisors, or others who have assisted or are assisting to any degree in the representation of Abraxis in this litigation matter;

(b) the Morrison Foerster attorneys, patent agents, law clerks, legal assistants, scientific advisors, or others who are prosecuting Abraxis's applications or patents that claim priority benefit from the patents that cover or mark Abraxane®; and

(c) the dates and circumstances of the safeguards that Morrison Foerster has implemented or intends to implement to protect those in group (a) above from disclosing Plaintiff's confidential information to those in group (b) above.

Defendant's Issues:

1. Elan's responses to Abraxis's document requests.

2. Elan's responses to Abraxis's interrogatories.

3. Elan's responses to Abraxis's requests for admission.

Respectfully,

/s/ *Tiffany Geyer Lydon*

Tiffany Geyer Lydon (I.D. #3950)

TGL:nml
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cc: Clerk of the Court (via electronic filing)
Josy W. Ingersoll, Esquire (via electronic mail)
Michael A. Jacobs, Esquire (via electronic mail)
Emily A. Evans, Esquire (via electronic mail)