EXHIBIT 16

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ELAN PHARMA INTERNATIONAL LIMITED,	§	
Plaintiff,	§	
v.	§	Case No. 06-438-GMS
ABRAXIS BIOSCIENCE, INC.,	§	
Defendant.	§	

EXHIBIT 16: ABRAXIS'S PROPOSED VOIR DIRE.

Abraxis objects to Elan's proposed voir dire because it is overlong and to the extent it asks intrusive, prejudicial, or otherwise improper questions. Below Abraxis proposes a shorter and more neutral voir dire.

Please introduce yourself, providing your education, occupations since around 1990, and marital status.

1. With respect to the following companies, Kodak, Sterling Drug, Sterling Winthrop, Particulate Prospects, NanoSystems, Abraxis BioScience Inc., American BioSciences, Inc., American Pharmaceutical Partners, VivoRx, Elan Pharma International, and Elan Corporation:

   (a) Are you personally acquainted with any officer, director, or employee of any of those companies?
   (b) Do you or any member of your household now own, or have you or any such member ever owned any stocks or bonds in any of the companies?
   (c) Have you, any family member, or anyone close to you had any dealings with, or relied financially in any way on, any of the companies?
   (d) Have you, any family member, or anyone close to you had any negative experience with any products of any of those companies or otherwise have any strong feelings, positive or negative, toward any of these companies?

2. You have been given a list of law firms and attorneys. Are you related to, or personally acquainted with, any of those attorneys, or have you ever been represented by any of those attorneys or other associates or members of the listed law firms?

3. You have been given a list of the individuals who might appear as witnesses in this case. Are you related to, or personally acquainted with, any of those individuals?

4. Do you have any personal knowledge of this case, or have you read or heard it discussed, or have an opinion regarding it?

5. Have you ever been a plaintiff, a defendant, or a witness in a civil lawsuit? Please briefly describe that involvement and how it has impacted your views of the legal system.

6. Have you ever served as a juror in a civil lawsuit? Please briefly describe that experience.

7. You have been given a list of subject areas. Have you, a close friend, or a family member ever been employed, trained, or had any experience in any of the listed areas?

8. Do you have any knowledge or experience with patents, including applying for a patent? Please describe that experience briefly.

9. Have you ever worked for a company that had patented products or processes? Please describe any opinions you formed about the patent system based on your experience.

10. Have you ever been involved in the development of a new product or process? Please describe your experience.

11. Have you, any member of your immediate family, or anyone close to you ever had any dealings with the United States Patent and Trademark Office? Please describe any opinions you formed about the patent system based on that experience.

12. Do you have any strong opinions about a patent granting exclusive rights to the inventors or their employers? What are they?

13. Do you believe it would be wrong for someone to profit from his or her invention or discovery? Please explain.

14. Do you have any strong opinions about the pharmaceutical industry, particularly with respect to medicines involved in the treatment of cancer? Please explain.

15. Do you own stock in any pharmaceutical or other companies involved in medicine? Please elaborate.

16. Do you believe that medication and pharmaceutical treatments for disease and illness should be entitled to patent protection? Please explain.

17. Have you, a family member or close friend ever been employed in a medical profession, or by a company that makes medical devices, pharmaceuticals or other medical products? Please describe.

18. Have you, a family member or close friend ever received treatment for any type of cancer? (Then responses can be done in private.) Understanding this is a sensitive issue and without prying, can you tell us a bit more about who you know, the type of cancer and whether or not that individual received chemotherapy or radiation?

19. Have you ever heard of or been treated with the product Abraxane®, or the product Taxol®, or the product Taxotere®? If so, please explain when, where, and what you have heard.

20. Do you have any special disability or problem that would make it difficult or impossible for you to serve as a member of the jury on this case?

21. Do you know of any other matter which you believe should be called to the court's attention as having some bearing upon your qualifications or ability to sit as a juror, or which you think may prevent you from rendering a fair and impartial verdict based solely upon the evidence and my instructions as to the law?

EXHIBIT A

Law Firms and Attorneys

William Sipio

Ashby & Geddes

- Steven J. Balick
- John Day

Baker Botts LLP

- Fred Barrera
- Lisa Chiarini
- Paul F. Fehlner
- Linda Glover
- Robert Riddle
- Stephen Scheve
- Jeffrey Sullivan

Morrison & Foerster LLP

- Michael A. Jacobs
- Emily A. Evans
- Eric S. Walters
- Erik J. Olson
- Anders T. Aannestad
- Paul F. Coyne
- Diana B. Kruze

Young, Conaway, Stargatt and Taylor LLP

- Josy W. Ingersoll
- Elena C. Norman
- Karen E. Keller
- Michele Sherretta Budicak
- Jeffrey T. Castellano

EXHIBIT B

Subject Areas

1. Biology
2. Engineering
3. Pharmacology
4. Chemistry
5. Medicine
6. Accounting
7. Science
8. Oncology
9. Math/Statistics