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March 13, 2007

VIA ELECTRONIC FILING

The Honorable Gregory M. Sleet
United States District Court
844 King Street
Wilmington, Delaware 19801

Re: *Elan Pharma International Limited v. Abraxis Bioscience, Inc.*,
Civil Action No. 06-438-*GMS*

Dear Judge Sleet:

In anticipation of the discovery teleconference scheduled for March 15, 2007 at 11 a.m. EDT 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 Requests for Production Nos. 1, 2, 4, 17, and 18.

2. Plaintiff seeks an order compelling Defendant to produce documents regarding its organizational structure, which would be responsive to Elan's Requests for Production Nos. 14 and 15; and to produce documents regarding the Patents-In-Suit, which would be responsive to Elan's Requests for Production 9, 28 and 29.

3. Plaintiff seeks an order compelling Defendant to produce analytical data concerning Abraxane®, and methods for obtaining such data, which would be responsive to Elan's Requests for Production Nos. 16, 22, and 32.

4. Plaintiff requests that the Court establish a timeline by which Defendant is required to produce post FDA approval documents as compelled on February 16, 2007, and internal sales and marketing documents as agreed by Defendant on the same date.

5. Plaintiff is aware that the District of Delaware's judicial resources are currently strained. Unfortunately, Plaintiff anticipates that there will continue to be numerous discovery issues

between the parties that require intervention. To address the issues expeditiously without further burdening the Court, Plaintiff seeks the appointment of a master to mediate discovery disputes.

Defendant's Issues

1. Schedule for Elan's document production and extending the deadline for amending the pleadings.

2. Elan's failure to produce key inventor documents and heavy redaction of the technical documents it has chosen to produce.

3. Elan's 10 subpoenas to medical institutions and doctors who conduct Abraxis's clinical trials.

Respectfully,

/s/ Tiffany Geyer Lydon

Tiffany Geyer Lydon

TGL/dmf
178830.1

cc: Josy W. Ingersoll, Esquire (hand delivery)
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