IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TAKEDA PHARMACEUTICAL COMPANY LIMITED, TAP PHARMACEUTICAL PRODUCTS INC., and ETHYPHARM, S.A.,	)	
Plaintiffs,	)	
v.	)	C.A. No. 07-331-SLR
TEVA PHARMACEUTICALS USA, INC., and TEVA PHARMACEUTICAL INDUSTRIES LTD.,	)	
Defendants.	)	

PLAINTIFFS TAKEDA'S AND TAP'S SUPPLEMENTAL NOTICE OF DEPOSITION PURSUANT TO FED.R.CIV.P. 30(b)(6) TO TEVA PHARMACEUTICAL INDUSTRIES LTD.

PLEASE TAKE NOTICE that, in accordance with Rules 26 and 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiffs Takeda Pharmaceutical Company, Ltd. ("Takeda"), TAP Pharmaceutical Products Inc. ("TAP"), and Ethypharm, S.A. ("Ethypharm"), by and through their attorneys, will take the deposition of Defendant Teva Pharmaceutical Industries Ltd. ("Teva") through one or more of its officers, directors, managing agents, or other persons who consent to testify on its behalf and who are most knowledgeable with respect to the deposition subjects set forth in Schedule A at the time and place set forth below.

Said deposition will be taken on July 28, 2008 at 9:30 a.m. and will be taken at the offices of Hogan & Hartson LLP, 875 Third Avenue, New York, NY, or at such other time and place as may be agreed to by the parties. The deposition will continue day-to-day until completed as provided in the Federal Rules of Civil Procedure and the Discovery Order in this case. The deposition will be recorded stenographically and by videotape.

PLEASE TAKE FURTHER NOTICE that Teva is requested to identify, on or before July 14, 2008, its designated witnesses, their full titles and the matters to which each will testify.

You are invited to attend and cross-examine.

ASHBY & GEDDES

/s/ Tiffany Geyer Lydon

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Dated: June 24, 2008

SCHEDULE A

DEFINITIONS

A. "Teva" means Defendant Teva Pharmaceutical Industries Ltd.; all parents, subsidiaries, and affiliates thereof; all divisions, predecessors, successors, and assigns of each of the foregoing; and all officers, directors, employees, agents, consultants, attorneys, and all other persons acting or purporting to act on behalf of, or under the control of, each of the foregoing.

B. The "Patents-in-Suit" shall mean, for purposes of this Notice, U.S. Patent Nos. 5,464,632 ("the '632 patent"), and 6,328,994 ("the '994 patent").

C. The term "ANDA" means an Abbreviated New Drug Application filed with the Food and Drug Administration ("FDA").

D. The term "ODT" means orally-disintegrating tablet.

E. The term "Teva's ODT Products" mean the pharmaceutical forms which are the subject of Teva's ANDA No. 78-730.

F. "Concerning" means comprising, containing, embodying, discussing, reflecting, identifying, referring to, relating to, describing, evidencing, or constituting.

G. The term "communication" means the transfer or transmittal of information (in the form of facts, ideas, inquiries, or otherwise), whether oral or written.

H. "Person" shall mean (a) natural persons (also referred to as "individuals"), (b) legal entities, including, without limitation, corporations, partnerships, firms, associations, professional corporations and proprietorships, and (c) governmental bodies or agencies.

I. To "identify" or provide "identification" in the case of a document means to state:

i. The document's title and date, if any, as well as a brief description of its subject matter;

ii. The type or nature of the document (e.g., letter, memorandum, telegram, chart, laboratory report, etc.) and the number of pages in it;

iii. The identity of any person who prepared the document (and, if different, the identity of any person who signed the document);

iv. The date the document was drafted;

v. The identity of any person who received a copy of the document (whether an addressee or otherwise);

vi. The present whereabouts of the document and the identity of its custodian; and

vii. All other means of identifying the document with sufficient particularity to support a request for production under Rule 34 of the Federal Rules of Civil Procedure.

J. To "identify" or provide "identification" in the case of a thing means to state:

i. A brief description of the thing, including any product numbers, part numbers, model numbers, catalog numbers, style numbers, code numbers, brand names, trade names, trademarks, commercial or governmental designations, and any other identifying markings, features, or characteristics;

ii. The present whereabouts of the thing;

iii. The identity of the person having possession, custody, or control of the thing; and

iv. All other means of identifying the thing with sufficient particularity to support a request for production under Rule 34 of the Federal Rules of Civil Procedure.

K. To "identify" or provide "identification" in the case of a person means to state:

i. The person's home and business addresses (present or last known);

ii. The person's full name; and

iii. The time period and nature of each of his or her present and prior employment

positions or affiliations with Teva, if any.

L. To "identify" or provide "identification" in the case of a department, affiliate or group means to state:

i. The full name of the department, affiliate or group;

ii. The nature of the department, affiliate or group and its corporate relationship to or within Teva;

iii. The location of its offices;

iv. The identity of each of its principals, officers, directors, partners, or members; and

M. "And" and "or" shall be construed conjunctively or disjunctively as necessary to make the discovery requests inclusive rather than exclusive; use of a singular noun shall be construed to include the plural noun, and use of a plural noun shall be construed to include the singular noun; the use of a verb in any tense shall be construed as the use of that verb in all other tenses whenever necessary to bring within the scope of the discovery request documents or information that might otherwise be construed to be outside its scope.

RULE 30(b)(6) TOPICS

28. The circumstances under which Teva decided to use two populations of sugar spheres (SUG PF001 250/355 and SUG PF003 400/500) in Teva's ODT Products.

29. The circumstances surrounding the production of the "approximately 50g of lansoprazole pellets, lot number K-39059" sent by Darcy L. Jones of Sutherland Asbill & Brennan to Dillon Kim of Hogan & Hartson on May 29, 2008, including how such pellets were manufactured and packaged.

30. The circumstances surrounding the production of any other lansoprazole pellets subsequently provided to Plaintiffs by Teva or Sutherland Asbill & Brennan, including how such pellets were manufactured and packaged.

31. All efforts by Teva to design around the '994 patent.

32. All efforts by Teva to design around the '632 patent.

33. Any formulations of lansoprazole produced or tested by Teva that did not use Starlac but that used other disintegration-promoting compounds.

34. Any formulations of lansoprazole produced or tested by Teva that used different excipients from the formulation in Teva's ANDA.