IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

RECKITT BENCKISER PHARMACEUTICALS, INC., RB PHARMACEUTICALS LIMITED, and MONOSOL RX, LLC, Plaintiffs, v. WATSON LABORATORIES, INC., Defendant.	Civil Action No. 1:13-cv-01674 (RGA)

DECLARATION OF HOUDA MORAD IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANT'S MOTION TO DISMISS COUNTS II AND IV OF THE COMPLAINT UNDER RULE 12(b)(1)

I, Houda Morad, declare and state as follows:

1. I am an associate at the law firm of Steptoe & Johnson LLP and I have applied for admission pro hac vice as counsel for Plaintiff MonoSol Rx, LLC in this matter.

2. This declaration is submitted in support of Plaintiffs' opposition to Defendant Watson Laboratories, Inc.'s ("Watson") motion to dismiss counts II and IV of the complaint under Rule 12(b)(1). I have first-hand knowledge of the information contained in this declaration.

3. Attached as Exhibit 1 is a true and correct copy of a press release issued by Actavis[1] on October 8, 2013. Exhibit 1 states that "Actavis believes it may be a 'first applicant' to file an ANDA for a generic version of Suboxone® Film and, should its ANDA be approved,

[1] Actavis, Inc. ("Actavis"), initially named as a defendant in this action, was dismissed by stipulation. (D.I. 10, Stipulation at 2.) Defendant Watson is a wholly-owned subsidiary of Actavis, Inc. (see D.I. 15, Rule 7.1 Disclosure Statement at 1.)

may be entitled to 180 days of generic market exclusivity." Exhibit 1 also states that "[f]or the 12 months ending August 31, 2013, Suboxone® Film 2/0.5mg and 8/2 mg had total U.S. sales of approximately $1.2 billion, according to IMS Health data."

4. Attached as Exhibit 2 is a true and correct copy of a Citizen Petition submitted by Plaintiff Reckitt Benckiser Pharmaceuticals, Inc. ("RBP") to the FDA on September 25, 2012. Exhibit 2, page 23, states that: "FDA approved Suboxone Film in August of 2010. In September of that year, RBP began distribution of Suboxone film with unit-dose child-resistant packaging."

5. Attached as Exhibit 3 is a true and correct copy of a page from Actavis' website showing buprenorphine and naloxone (Suboxone® active ingredients) sublingual tablets as one of their products and including a link to "U.S. Prescribing Info[rmation]."

6. Attached as Exhibit 4 is a true and correct copy of a letter from the U.S. Food and Drug Administration ("FDA") approving Actavis' Abbreviated New Drug Application ("ANDA") for a generic version of Suboxone® sublingual tablets (ANDA No. 091422).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on December 13, 2013.

Houda MORAD

Houda Morad