EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

APOTEX, INC. and APOTEX CORP., Plaintiffs, v. MYLAN PHARMACEUTICALS INC., Defendant.	CASE NO. 12-60704-CIV-SEITZ/SIMONTON
APOTEX, INC. and APOTEX CORP., Plaintiffs, v. PFIZER INC., and GREENSTONE LLC, Defendants.	CASE NO. 12-60705-CIV-SEITZ/SIMONTON
APOTEX, INC. and APOTEX CORP., Plaintiffs, v. LUPIN PHARMACEUTICALS, INC. and LUPIN LTD., Defendants.	CASE NO. 12-60708-CIV-SEITZ/SIMONTON

DEFENDANTS' JOINT PROPOSED CLAIM TERM CONSTRUCTIONS

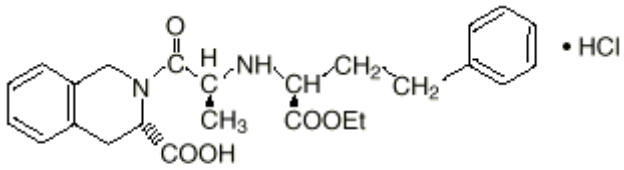
Pursuant to the Court's Scheduling Order of September 24, 2012, Defendants Lupin Ltd., Lupin Pharmaceuticals Inc., Pfizer Inc., Greenstone LLC, and Mylan Pharmaceuticals Inc. ("Defendants") hereby provide to Apotex Corp. and Apotex Inc. ("Plaintiffs") their proposed claim constructions. These disclosures are based upon information reasonably available to Defendants at this time, and are made without prejudice to Defendants' right to assert that any of the claim terms are indefinite, or to amend or supplement these disclosures in the future, including as a result of the discovery or investigation of further information. Defendants reserve the right to offer expert testimony and other intrinsic or extrinsic evidence to support Defendants' proposed positions, or to rebut Plaintiffs' proposed meanings, expert testimony or other evidence, if any, offered by Plaintiffs in support of their proposed claim constructions. In addition, Defendants request a meet and confer on December 5, 2012 for the purposes of limiting the claim terms in dispute by narrowing the issues.

Claim Term to be Construed[1]	**Proposed Construction**
"quinapril magnesium"	The magnesium salt of quinapril having the chemical formula $Mg(C_{25}H_{29}N_2O_5)_2$[2]

[1] The claim term constructions proposed herein are put forward by each defendant only with respect to terms in the particular claims asserted against that particular defendant and each defendant reserves the right to advance additional and/or different constructions with respect to any claims not currently asserted against it by Apotex.

[2] Defendants note that the proposed construction above is the only information provided in the '486 patent concerning the composition of "quinapril magnesium" and there is no accepted meaning in the art for this term. The '486 patent does not provide the chemical structure of such a compound, evidence that such a compound exists, or a test for determining its existence. As such, Defendants contend that the term "quinapril magnesium" is indefinite, as are other claim terms (*see* Defendants' Joint Invalidity Contentions).

"reacting . . . so as to convert" [to quinapril magnesium]	Performing a process, different from standard wet granulation, which chemically transforms quinapril or an acid addition salt thereof and an alkaline magnesium compound to produce quinapril magnesium
"quinapril or an acid addition salt thereof"	The compound which is chemically described as [3S-[2[R*(R*)],3R*]]-2-[2-[[1-(ethoxycarbonyl)-3-phenylpropyl]amino]-1-oxopropyl]-1,2,3,4-tetrahydro-3-isoquinolinecarboxylic acid or an acid addition salt thereof
"alkaline magnesium compound"	A magnesium compound which when dissolved in water would produce a pH value which is above 7.0
"solid pharmaceutical composition"	Compressed tablets or fill for two-piece hard gelatin capsules.
"in the presence of a solvent"	A liquid of a type and in an amount sufficient to dissolve the quinapril or an acid addition salt thereof and the alkaline magnesium compound to enable the reaction
"wet mass"	The material resulting from the wet granulation (as described in the '486 patent) of at least quinapril or an acid addition salt thereof, an alkaline magnesium compound and the solvent
"dry mass"/ "dried mass"	The material that results upon removing the solvent from the wet mass
Claim 5: Whether the order of steps is a limitation	Yes
Claim 6: Whether the order of steps is a limitation	Yes

Claim 7: Whether the order of steps is a limitation	Yes
Claim 8 Whether the order of steps is a limitation	Yes
Claim 11 "quinapril hydrochloride"	Quinapril hydrochloride is chemically described as [3S-[2[R*(R*)],3R*]]-2-[2-[[1-(ethoxycarbonyl)-3-phenylpropyl]amino]-1-oxopropyl]-1,2,3,4-tetrahydro-3-isoquinolinecarboxylic acid, monohydrochloride. Its empirical formula is $C_{25}H_{30}N_2O_5 \bullet HCl$ and its structural formula is:  M.W.=474.98
Claim 16 "at least about" [80%]	More than 75%

Dated: November 30, 2012

/s/ Soumitra Deka

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing DEFENDANTS' JOINT PROPOSED CLAIM TERMS CONSTRUCTIONS was served by e-mail on November 30, 2012 on all counsel or parties of record on the Service List below.

BY: /s/ Soumitra Deka
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