EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 12-60704–CIV–SEITZ/SIMONTON
(as consolidated with Case Nos. 12-60705-CIV and 12-60708-CIV)

APOTEX, INC., *et al.*,

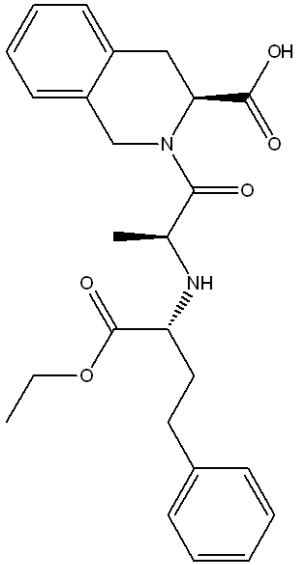
Plaintiffs,

v.

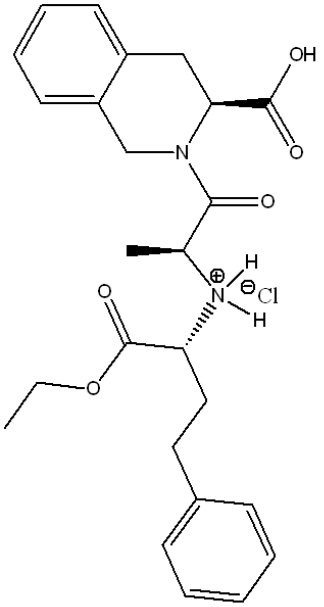
MYLAN PHARMACEUTICALS INC.,

Defendant.
_____/

PROPOSED CONSTRUCIONS OF CLAIM TERMS IN THE ‘486 PATENT

Claim	Term	Agreed Upon Construction	Apotex's Proposed Construction	Defendants' Proposed Constructions
1	"solid pharmaceutical composition"	finished solid dosage form capable of being administered as a drug product		
1	"quinapril magnesium"	magnesium salt of quinapril having the chemical formula $Mg(C_{25}H_{29}N_2O_5)_2$		
1	"quinapril or an acid addition salt thereof"	chemical compound having the formula $C_{25}H_{30}N_2O_5$ and the chemical structure shown below, or an acid addition thereof 		
1	"alkaline magnesium compound"	magnesium compound that, when added to water, results in a pH greater than about 7		

1	"in the presence of a solvent"	No agreement, but parties are willing to propose definition to clarify issues for court	with a sufficient amount of a liquid to at least moisten the quinapril or acid addition salt thereof and the alkaline magnesium compound to permit the reaction to occur	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
1	"reacting ... so as to convert ... to quinapril magnesium"	No agreement, but parties are willing to propose definition to clarify issues for court	chemically changing a significant portion of the quinapril or acid addition salt thereof 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
5-8	whether the order of steps is a limitation	The claimed method requires the steps to be performed in the order set forth in the claims		
6-8	"wet mass"	To be briefed	material that is sufficiently wetted with solvent to form lumps or granules and to permit the reaction to occur	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
6-8	"dry mass" or "dried	To be briefed	material that results from	The material that results

	mass”		removing a sufficient amount of solvent from the wet mass to allow further processing Note change from “water” to “solvent” in the above proposal	upon removing the solvent from the wet mass
11	“quinapril hydrochloride”	hydrochloric acid addition salt of quinapril having the empirical formula $C_{25}H_{30}N_2O_5 \cdot HCl$ and the chemical structure shown below 		

12	"at least about 80%"	To be briefed	approximately 80% or more	More than 75%