EXHIBIT D

Simic, Emer

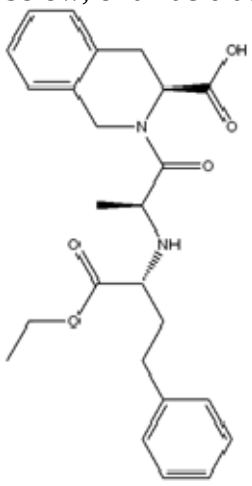
From: Masar, Martin S. [martin.masar@kattenlaw.com]
Sent: Friday, December 14, 2012 12:20 AM
To: 'Stiefel, Aaron'; USR-FRM-Quinapril
Cc: Green, Robert; Banky, Paki; Simic, Emer; Becker, Sylvia; DiNapoli, Daniel; Deka, Soumitra; Alyonycheva, Tatiana; Harris, David
Subject: Quin - Proposal for Minor Change to Agreed Upon Constructions

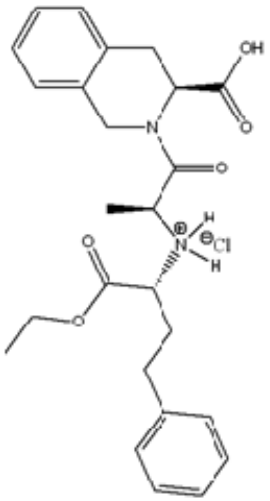
Importance: High

Counsel for All Defendants:

The agreed upon constructions for below use "chemical formula", "formula" and "empirical formula" (bolded) for the same concept. Apotex proposes that we change the agreed upon constructions to all read "chemical formula" to minimize confusion by the jury and judge. Please let us know if you are amenable to our proposal.

Regards,
Marty

CLAIM	CLAIM TERM	CONSTRUCTION
1	"quinapril magnesium"	the 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 salt thereof 
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

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