LAW OFFICES
KRAMON & GRAHAM, P. A.
ONE SOUTH STREET
SUITE 2600
BALTIMORE, MARYLAND 21202-3201
TELEPHONE: (410) 752-6030
FACSIMILE: (410) 539-1269

www.kramonandgraham.com

GEOFFREY H. GENTH
DIRECT DIAL
(410) 347-7436

ALSO ADMITTED IN NY

E-MAIL
ggenth@kg-law.com

August 21, 2009

BY ELECTRONIC CASE FILING

The Honorable J. Frederick Motz
United States District Judge
United States District Court for the District of Maryland
101 West Lombard Street
Baltimore, Maryland 21201

RE: *Genzyme Corp. v. Lupin, Ltd., et al.*, Civ. No. JFM-09-563;
Genzyme Corp. v. Impax Laboratories, Inc., Civ. No. JFM-09-653;
Genzyme Corp. v. Impax Laboratories, Inc., Civ. No. JFM-09-846; and
Genzyme Corp. v. Lupin, Ltd., et al., Civ. No. JFM-09-1258

Dear Judge Motz:

I write to follow up on my July 2, 2009 letter to the Court and the Court's July 14, 2009 memo to counsel in the third of the above-referenced cases ("*Impax 2*").

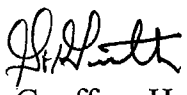
In light of certain common questions of law or fact, counsel for all parties in the four above-referenced cases believe that coordinated discovery would be appropriate for purposes of speed and economy. Counsel respectfully request that Your Honor please set a single scheduling conference to occur in all four cases in the second half of September.

In keeping with the Court's June 23, 2009 memo to counsel in *Impax 2*, counsel in all four cases propose to submit a proposed schedule to Your Honor on or before noon on the business day before the scheduling conference. Before the scheduling conference, counsel will also discuss with one another document production issues and, specifically, e-discovery issues, changes to discovery limits, the necessary components of a protective

order, as well as specific procedures for coordinated discovery. If counsel cannot agree on a proposed schedule or other case management issues, counsel will outline any disagreements in the scheduling letter to the Court.

Counsel ask that Your Honor please let counsel know if the Court desires any additional information at this time. Thank you for the Court's consideration.

Respectfully,



Geoffrey H. Genth

GHG/ms

cc: All Counsel of Record (by Electronic Case Filing)