
From: Houston, Michael R.
Sent: Wednesday, December 27, 2017 12:59 PM
To: Adam LaRock
Cc: ARG - dymista; McParland, Jim; Meara, Joe; Dennies Varughese; Deborah Sterling; Uma Everett; Josh Miller; Tyler Liu
Subject: RE: IPR2017-00807 // Dr. Carr deposition

Adam,

The additional individuals that we believe Cipla must make available for deposition are Dr. Govindarajan, Dr. Herpin, Dr. Malhotra, and a representative from Avomeen. Absent making such depositions available, we will seek to have the data/report/declaration testimony from these sources excluded from the proceeding.

Please let me know when you are available to discuss the scheduling of these depositions, as well as those for the other declarants mentioned in my prior email below.

Best regards,

Mike

Michael R. Houston

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