

**From:** [Daniel L. Shores](#)  
**To:** [Edwards, Jeremy](#)  
**Cc:** [Maddox, Steven](#); [Garrison, Brett](#); [Joseph A. Hynds](#); [Aydin Harston](#); [Adam M. Nicolais](#); [Nasri Hage](#)  
**Subject:** Re: ChemGenes' document request  
**Date:** Thursday, March 14, 2024 4:55:46 PM  
**Attachments:** [image001.jpg](#)

---

Jeremy,

You have not "fully" responded to our request to produce [REDACTED]. You instead ignored it for nearly 10 days. We completely disagree with your other statements below as well as the statements made in your email dated February 26.

Your sole basis for refusal to produce [REDACTED] is that you do not have "permission" [REDACTED]. This is baseless, especially since those documents would be produced under the terms of the Protective Order.

Your communications and conduct reflect nothing more than a continued pattern of concealment of Dr. Baran's undisclosed financial and business interests with Hongene, the scope of which cannot be fully understood because Hongene is withholding documents.

The Board should be made fully aware of these interests to properly evaluate the level to which Dr. Baran's testimony is tainted with bias. We reserve all rights to seek leave and move the Board requesting an order that this discovery be provided.

Best regards,  
Dan

---

From: Edwards, Jeremy <Jeremy.Edwards@procopio.com>  
Date: Wednesday, March 13, 2024 at 3:56 PM  
To: Daniel L. Shores <DShores@rfem.com>  
Cc: Maddox, Steven <Steven.Maddox@procopio.com>, Garrison, Brett <Brett.Garrison@procopio.com>, Joseph A. Hynds <jhynds@rothwellfigg.com>, Aydin Harston <aharston@rothwellfigg.com>, Adam M. Nicolais <anicolais@rothwellfigg.com>, Nasri Hage <Nhage@rothwellfigg.com>  
Subject: [EXTERNAL] ChemGenes' document request

CONTAINS PROTECTIVE ORDER MATERIAL

Dan,

Hongene has already answered your request to produce [REDACTED]. You asked for it on February 21. It was encompassed by item 5 in that request. I responded on February 23. You responded on the same day with some spurious propositions. I debunked those propositions in my email to you the

next business day, February 26.

You did not acknowledge or respond to the substance of my February 26 response. Instead, you waited a week and then asked for [REDACTED] on March 4.

Now you have waited more than another week to ask again. I have no further information to provide. You have had our position since February 23<sup>rd</sup>, or the 26<sup>th</sup> at the latest. Your reiterated request still implicates the confidentiality interest of a third party that I still do not represent. And I still do not have permission from that third party to produce the document.

Sincerely,

Jeremy

**JEREMY J. EDWARDS**  
PARTNER

P. 202.830.0540 C. 410.627.6833 | [jeremy.edwards@procopio.com](mailto:jeremy.edwards@procopio.com)  
1901 L. Street, N.W., Suite 620, Washington, DC 20036

[View Profile](#) | [LinkedIn](#) | [procopio.com](http://procopio.com)



---

**From:** Daniel L. Shores <DShores@rfem.com>

**Sent:** Wednesday, March 13, 2024 2:24 PM

**To:** Edwards, Jeremy <Jeremy.Edwards@procopio.com>

**Cc:** Maddox, Steven <Steven.Maddox@procopio.com>; Garrison, Brett <Brett.Garrison@procopio.com>; Joseph A. Hynds <jhynds@rothwellfigg.com>; Aydin Harston <aharston@rothwellfigg.com>; Adam M. Nicolais <anicolais@rothwellfigg.com>; Nasri Hage <Nhage@rothwellfigg.com>

**Subject:** Re: Tomorrow's filing

**\* EXTERNAL EMAIL - Please use Caution. \***

Thanks, Jeremy. We will get back to you soon on this. We just received your comments yesterday and additional comments only a few hours ago.

We have not received any response to our March 4 request that the [REDACTED] be produced (see attached correspondence). Could you please produce it and advise on when that will happen?

Thanks,  
Dan