

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

AMGEN INC.,)	
)	
Plaintiff,)	
)	Civil Action No.: 05-12237 WGY
v.)	
)	
F. HOFFMANN-LA ROCHE)	
LTD., a Swiss Company, ROCHE)	
DIAGNOSTICS GmbH, a German)	
Company and HOFFMANN-LA ROCHE)	
INC., a New Jersey Corporation,)	
)	
Defendants.)	
_____)	

**DECLARATION OF CHERIE ST. JEAN IN SUPPORT OF AMGEN INC.'S BENCH
MEMORANDA REGARDING THE AUTHENTICATION OF
JAN. 11, 1984 TELEX AND JAN. 16, 1984 LETTER**

I, Cherie St. Jean, declare as follows:

1. I am employed as a Senior Specialist Paralegal by AMGEN INC. My office address is One Amgen Center Drive, Thousand Oaks, California 91320.
2. I have been a paralegal with AMGEN INC. since June 1997. My responsibilities have been substantially the same since I began my employment with AMGEN INC.
3. As a paralegal, I have been responsible for and have overseen the collection of documents relevant to intellectual property litigation involving the Lin U.S. patents and foreign counterpart patents, as well as the receipt, storage and retention of documents and exhibits related to worldwide intellectual property litigation involving the Lin patents. In performing my job duties I have acquired an understanding of how AMGEN INC. receives, stores, retains, and produces documents related to worldwide intellectual property litigation involving the Lin U.S. patents and foreign counterpart patents.
4. I understand that each of the documents (without the AM-ITC production numbers) listed below were filed publicly and made of record in the *Amgen v. Chugai*, No. 87-2617-Y (D. Mass.) litigation:

BAH	AM-ITC 00186476	AM-ITC 00186476
GVC	AM-ITC 00168188	AM-ITC 00168188
FJX	AM-ITC 00186477	AM-ITC 00186481
GVK	AM-ITC 00346974	AM-ITC 00346978

5. Because these documents relate to intellectual property litigation involving Dr. Lin's patents, in accordance with Amgen's custom and practice, on information and belief, Amgen has maintained each of these documents in its possession, custody, and control in AMGEN INC.'s Law Department or in offsite storage since the time that these documents were made of record in the *Amgen v. Chugai* litigation.
6. I understand that excluding the addition of the production number, confidentiality legend or trial exhibit number related to the current proceedings, each document listed below was collected from Amgen's Law Department or from offsite storage under Amgen's control,

affixed AM-ITC production numbers, and produced to Roche in this litigation, and each was a true and accurate copy of the document or exhibit contained in AMGEN INC.'s Law Department or offsite storage under Amgen's control.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Signed this 12th day of September, 2007.

By: /s/ Cherie St. Jean
Cherie St. Jean

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on the above date.

 /s/ Patricia R. Rich

Patricia R. Rich