

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

AMGEN INC.,

Plaintiff,

v.

F. HOFFMANN-LAROCHE
LTD., a Swiss Company, ROCHE
DIAGNOSTICS GmbH, a German
Company and HOFFMANN LAROCHE
INC., a New Jersey Corporation,

Defendants.

Civil Action No.: 05-12237 WGY

DECLARATION OF DON H. CATLIN

I, Don H. Catlin, declare as follows:

1. I am President of Anti-Doping Research ("ADR"). ADR is a recently formed research institute with a mission to create innovative solutions to problems in detecting the use of sports doping agents. From 1972 - 2007, I served on the faculty at UCLA as an assistant, associate, and full Professor of Molecular and Medical Pharmacology. In March 2007, I resigned from my position to focus on my research at ADR full-time. I remain a professor emeritus at UCLA.

2. I make this declaration of my own personal knowledge. If called to testify as to the truth of the matters stated herein, I could and would testify competently.

3. In 1982, I founded the first sport testing laboratory in the United States (the UCLA Olympic Analytical Laboratory) and directed this laboratory for 25 years while it became the largest and most successful such laboratory in the world. It was accredited by the International Olympic Committee (IOC) and later by the World Anti-Doping Agency (WADA). The laboratory routinely tests for over 200 different illicit compounds, including recombinant EPO. Among the laboratory's accomplishments are performing the testing for the 1984 Olympic Games of Los Angeles, the 1996 Olympic Games of Atlanta, and the 2002 Olympic Games of Salt Lake City.

4. I have been a member of the Medical Commission of the International Olympic Committee ("IOC") since 1988. I have been chairman of the Science and Medicine Subcommittee of the IOC Medical Commission since 2003.

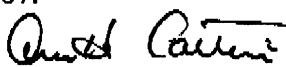
5. On September 26-28, I must attend a long-scheduled site visit to Beijing China for the purpose of reviewing the progress on medical and laboratory issues for the 2008 Olympic Games. A drug testing laboratory has been established in Beijing. This laboratory will be conducting the testing during the Beijing Games. I will be a member of team that will supervise the Beijing laboratory and will have responsibility for reviewing all positive cases before they are announced. Members of the IOC Medical Commission from all around the world will be traveling to Beijing for this meeting. Because of my position and expertise, I must be present.

6. I have already rescheduled a lecture in Hong Kong that had been set for September 24 to October 2 in order to appear in this Court. I will be arriving in Boston on Saturday September 22, 2007 and departing for China on the morning of Tuesday September 25. I will not return to California until October 3, 2007.

7. Because of my obligations in China, I would not be able to return to Boston to testify any earlier than October 5, 2007.

8. If called to testify on September 24, I expect to describe isoelectric focusing experiments performed at ADR under my direction that compare many samples of recombinant EPO to urinary EPO.

Signed this 17th day of September, 2007.


By: /s/ Don. H. Catlin
Don H. Catlin

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 on-registered participants.

/s/ Michael R. Gottfried
Michael R. Gottfried