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Mr. Crawford's affidavit is sufficient evidence — by itself — to the genuineness of these documents.² Under Federal Rule of Evidence 901, the proponent of a proffered exhibit need only make a prima facie showing that an exhibit is what the proponent claims it to be.³ Here, where that showing is pursuant to a statement by a person with personal knowledge, the burden of proof is light because the Federal Rules of Evidence favor admitting any evidence that might assist the trier of fact.⁴ As supported by Mr. Crawford's affidavit, these exhibits are exactly what Amgen claims — genuine communications between Genetics Institute and Chugai. Since these documents are authentic and fall within the ancient document exception to the hearsay rule, exhibits BAH and FJX should be admitted into evidence.

² See *Commercial Data Servers, Inc. v. Int'l Bus. Machs. Corp.*, 262 F.Supp. 2d 50, 58 (S.D.N.Y. 2003) (holding that authenticity under 901 was satisfied when attorney has personal knowledge that the documents attached to an affidavit were obtained during discovery by the firm); *Gulf Ins. Co. v. Glasbrenner*, 348 B.R. 47, 59 (S.D.N.Y. 2006) (Rule 901 satisfied by claimant's attorney providing sworn statement that the document was true and correct).

³ *U.S. v. Holmquist*, 36 F.3d 154, 168 (1st Cir. 1994) (burden of proof for authentication only requires proponent to show reasonable likelihood that exhibit is what proponent claims it to be).

⁴ *Woolsey v. National Transp. Safety Bd.*, 993 F.2d 516, 520 (5th Cir. 1993) ("personal knowledge" is broadly construed under FRE 901(b)(1)).