

EXHIBIT A

Exhibit BWZ-a
05-12237-WGY

**IN THE HIGH COURT OF JUSTICE
CHANCERY DIVISION
PATENTS COURT**

**CH 1993-K-No. 937
CH 1993-B-No. 4552**

In the matter of European Patents (UK) Nos. 148,605 and 411,678 and in the matter of actions for infringement and counterclaims for revocation thereof by inter alia Kirin-Amgen Incorporated, Janssen-Cilag Limited and Roche Diagnostics GmbH

**HC 1999 No. 02916
HC 1999 No. 02917
HC 1999 No. 03241**

In the matter of European Patents (UK) No. 148605 and in the matter of a claim for revocation and a claim for a declaration of non-infringement thereof by inter alia Transkaryotic Therapies Inc and an action for infringement by inter alia Kirin-Amgen Inc.

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SKELETON ARGUMENTS

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Skeleton Arguments

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AMGEN v. ROCHE

THE ROCHE PARTIES' SKELETON ARGUMENT

ON THE 605 PATENT

INTRODUCTION

Redacted

COMMON GENERAL KNOWLEDGE

The addressee of the 605 patent

Redacted

DNA aspects

17. The Roche parties submit that the following was common general knowledge in 1983/84. (We have not included a considerable amount of basic information which is included in the primer or otherwise appears to be uncontroversial.)

Redacted

- The major problem facing a skilled person who wanted to obtain human EPO DNA was the absence of a suitable tissue source of human EPO mRNA from which a cDNA library could be constructed. The Roche parties submit that it was common general knowledge that no suitable tissue source had been identified.

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