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EXHIBIT A

UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

AMGEN INC.,)
Plaintiff, v.)) Civil Action No.: 05 Civ. 12237 WGY
F. HOFFMANN-LA ROCHE LTD, ROCHE DIAGNOSTICS GmbH, and HOFFMANN-)))
LA ROCHE INC., Defendants.)
)

[PROPOSED] ORDER GRANTING DEFENDANTS' MOTION TO COMPEL THE PRODUCTION OF DOCUMENTS

This matter came before the Court upon a motion to compel filed by Defendants F.

Hoffmann-La Roche Ltd, Roche Diagnostics GmbH, and Hoffmann-La Roche Inc. (collectively "Roche") on December 15, 2006. Having considered the memorandum in support of Roche's motion, plaintiff Amgen Inc.'s ("Amgen's") opposition, and all other submissions and arguments of the parties, IT IS HEREBY ORDERED that Amgen shall produce documents regarding the following topics in response to the following document requests:

Document Topic	Corresponding Request For Production
Documents relating to and demonstrating Amgen's efforts in developing pegylated compounds, including pegylated G-CSF, pegylated MGDF, and pegylated NESP	19, 20, 27-35, 58, 59, 70, and 105-112
Documents relating to and identifying research and development of Amgen's Aranesp®, including those identifying its structure and biological activity	20, 24-26, 31, 33-35, 42, 43, 45, 55, 56, 58-74, 78, 86, 87, 105-112, 114, 117 and 118

IT IS FURTHER ORDERED THAT Amgen's general objections Nos. 10 (ESAs that are not erythropoietin) and 11 (Pegylated Compounds) are **OVERRULED**.

SO ORDERED on this _____ day of December, 2006.

The Honorable William G. Young United States District Court for the District of Massachusetts

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