REQUEST FOR PRODUCTION NO. 245:

All correspondence between Amgen and Sir John Walker concerning any relevant matter to the current litigation, Including human erythropoietin of any source, use of human erythropoietin as a therapeutic agent, mechanisms of action or clinical use of erythropoiesis stimulating agents other than erythropoietin, and communications regarding any of Amgen's competitors in the renal anemia marketplace.

REQUEST FOR PRODUCTION NO. 246:

All correspondence between Amgen and Christopher Winearls concerning any relevant matter to the current litigation, Including human erythropoietin of any source, use of human erythropoietin as a therapeutic agent, mechanisms of action or clinical use of erythropoiesis stimulating agents other than erythropoietin, and communications regarding any of Amgen's competitors in the renal anemia marketplace.

REQUEST FOR PRODUCTION NO. 247:

All correspondence between Amgen and Julian Davies concerning any relevant matter to the current litigation, Including human erythropoietin of any source, use of human erythropoietin as a therapeutic agent, mechanisms of action or clinical use of erythropoiesis stimulating agents other than erythropoietin, and communications regarding any of Amgen's competitors in the renal anemia marketplace.

REQUEST FOR PRODUCTION NO. 248:

All correspondence between Amgen and Michael Heartlein concerning any relevant matter to the current litigation, Including human erythropoietin of any source, use of human erythropoietin as a therapeutic agent, mechanisms of action or clinical use of erythropoiesis stimulating agents other than erythropoietin, and communications regarding any of Amgen's

competitors in the renal anemia marketplace.

REQUEST FOR PRODUCTION NO. 249:

All correspondence Concerning grants awarded by Amgen to any expert witness in this case, Including but not limited to Lodish, Constantinescu and Adamson from 1981 through the present, Including all correspondence, applications, status reports, updates, presentations and contracts or agreements related to those grants.

REQUEST FOR PRODUCTION NO. 250:

All Documents and Electronic Data, Including scientific data, lab notebooks, letters, notes, memoranda, summaries and presentations, Including drafts of said documents, relating to Amgen's evaluation of a mutated G-CSF molecule created by Kyowa Hakko, Ltd.

REQUEST FOR PRODUCTION NO. 251:

All documents, including laboratory notebooks, scientific data, presentations, memoranda and research summaries, demonstrating Amgen's use of an erythropoietin radioimmunoassay, including documents sufficient to show the specific activity of erythropoietin reference sample used, source, titer and specific binding of erythropoietin antibody used, level of non-specific binding observed for each assay, and source and protocol for iodination of erythropoietin for use as a radiolabeled ligand.

REQUEST FOR PRODUCTION NO. 252:

All documents that would instruct one of skill in the art as of November 1984 how to test whether cultured vertebrate cells have produced erythropoietin in the medium of their growth in excess of 100 U of erythropoietin per 10^6 cells.

REQUEST FOR PRODUCTION NO. 253:

All documents that relate to Amgen's use of a "erythropoietin standard" disclosed in

Example 2 of the '349 patent (col. 16, line 43) or a "naturally-occurring human EPO standard" in Example 8 of the '349 patent (col. 24, line 51) from 1980 through 1992.

REQUEST FOR PRODUCTION NO. 254:

All documents that demonstrate Amgen's use of any erythropoietin standard in any radioimmunoassay from 1980 through 1992, including documents sufficient to identify each standard's source and specific activity.

REQUEST FOR PRODUCTION NO. 255:

All documents that demonstrate Amgen's use of anti-human erythropoietin antibodies for radioimmunoassay, including documents sufficient to show the each antibody's source, purification and specific binding against human erythropoietin.

REQUEST FOR PRODUCTION NO. 256:

All documents that demonstrate Amgen's use or development of methods for iodinating erythropoietin from any source between 1980 and 1984.

REQUEST FOR PRODUCTION NO. 257:

All documents, including laboratory notebooks, scientific data, presentations, memoranda and research summaries, concerning conversion of "U erythropoietin" to erythropoietin measured by weight between 1980 and 1992.

REQUEST FOR PRODUCTION NO. 258:

All documents demonstrating deposition of any antibody or erythropoietin standard used in radioimmunoassays disclosed in the '349 patent specification.

REQUEST FOR PRODUCTION NO. 259:

All Documents and Electronic Data Concerning any research at the University of

Chicago Concerning human EPO isolated from the urine of any human subject, and/or from any human tissue, human sample, and/or any cell, Including without limitation the isolation, purification, enzymatic digestion, sequencing, and/or any other analysis or characterization of such human EPO, and Including without limitation any such documents Concerning any research conducted by Dr. Eugene Goldwasser and/or Sanford Krantz, from 1975 through 1990 inclusive.

REQUEST FOR PRODUCTION NO. 260:

All Documents and Electronic Data Concerning any research at the University of Chicago Concerning any non-human EPO isolated from the urine of any animal, and/or from any tissue, sample, or cell, Including without limitation the isolation, purification, enzymatic digestion, sequencing, and/or any other analysis or characterization of any such non-human EPO, and Including without limitation any such documents Concerning any research conducted by Dr. Eugene Goldwasser and/or Sanford Krantz, from 1975 through 1985 inclusive.

REQUEST FOR PRODUCTION NO. 261:

All Documents and Electronic Data Concerning any agreement, collaboration, negotiation or communication of any kind between Amgen and the University of Chicago, from 1975 to the present, concerning any human EPO, non-human EPO, and/or any EPO analogs or mutants, Including without limitation:

(a) collaborations, consulting agreements, research agreements and research grants, Including without limitation any such agreements or grants concerning Dr. Eugene Goldwasser;

(b) attempts and/or negotiations to enter into any such agreement or collaboration, Including without limitation any such attempts and/or negotiations concerning Dr. Eugene Goldwasser;

(c) compensation, grants, gifts, stock or any other form of financial remuneration or benefit requested, obtained or received by the University of Chicago from Amgen, Including without limitation any such financial remuneration or benefit concerning Dr. Eugene Goldwasser;

(d) any rights to intellectual property, Including without limitation any discussions

or negotiations concerning any rights to intellectual property; Including without limitation any rights under any patent application or patent and/or any rights concerning Dr. Eugene Goldwasser.

REQUEST FOR PRODUCTION NO. 262:

All Documents and Electronic Data Concerning any sample(s) of human EPO maintained at the University of Chicago at any point from 1975 through 1987, inclusive, Including without limitation, any communications and/or requests to the University of Chicago Concerning such samples made from 1975 through the present, any business practices or policies concerning requests for such samples and policies regarding distribution of such samples to any person.

REQUEST FOR PRODUCTION NO. 263:

All Documents and Electronic Data Concerning research grants and any other sponsored research Concerning Eugene Goldwasser, his laboratory, and/or collaborators at the University of Chicago, obtained and/or received in part or in full from any state, federal or private agency or entity, from 1970 through 1985 inclusive, Including without limitation:

(a) any sponsored or supported research concerning EPO;

(b) any sponsored or supported research concerning any other chemical compound, either natural or synthetic, and known or thought to possess biological effects similar to EPO;

(c) any sponsored or supported research concerning any design, production, purification, isolation, or in vitro or in vivo characterization of EPO analogs or mutants, and all documents in your possession or control that refer or relate to these activities.

REQUEST FOR PRODUCTION NO. 264:

All Documents and Electronic Data Concerning any agreements between Amgen and Eugene Goldwasser, his laboratory and/or collaborators at the University of Chicago, regardless of subject matter, from 1975 through the present, Including without limitation any such agreements made between Amgen and the University of Chicago on behalf of Dr. Goldwasser

and/or his laboratory, and all Documents and Electronic Data Concerning any research grants and any other sponsored research obtained and/or received in part or in full from Amgen, Including without limitation:

(a) any sponsored or supported research concerning EPO;

(b) any sponsored or supported research concerning any other chemical compound, either natural or synthetic, and known or thought to possess biological effects similar to EPO;

(c) any sponsored or supported research concerning any design, production, purification, isolation, or in vitro or in vivo characterization of EPO analogs or mutants, and all documents in your possession or control that refer or relate to these activities;

(d) any other research grants, sponsorships, and equipment and reagent donations.

REQUEST FOR PRODUCTION NO. 265:

All Documents and Electronic Data Concerning collaboration and/or consulting agreements, from 1975 through 1985 inclusive, between the University of Chicago and companies other than Amgen, concerning EPO from any animal species, or any other chemical compound, either natural or synthetic, either known or thought to possess biological effects similar to EPO, Including without limitation any offers or proposals for such collaborations or consulting agreements.

REQUEST FOR PRODUCTION NO. 266:

All Documents and Electronic Data Concerning communications from 1975 through the present, between the University of Chicago and Amgen concerning the subject matter of Amgen's EPO patents, Including without limitation:

(a) the contribution of any person to that subject matter, Including without limitation, any examples in Amgen's EPO patents describing any cloning, purification, isolation and characterization of EPO;

(b) the prosecution of Amgen's EPO patents;

(c) licensing or enforcement by Amgen or any licensee of Amgen of any rights under Amgen's EPO patents, Including any litigation.

REQUEST FOR PRODUCTION NO. 267:

All Documents and Electronic Data Concerning patents or patent applications filed in the U.S. or abroad from 1975 through 1985 inclusive, and assigned to or otherwise concerning the University of Chicago, and concerning EPO from any species, or any other chemical compound, either natural or synthetic, either known or thought to possess biological effects similar to EPO.

REQUEST FOR PRODUCTION NO. 268:

All Documents and Electronic Data in the custody or control of Amgen Concerning any research concerning erythropoietin from any species, conducted by any undergraduate, graduate, or medical student, or postdoctoral fellow in collaboration with, or under the control or direction of Dr. Eugene Goldwasser, and/or while being advised by Dr. Goldwasser in any capacity about such research (the "student work"), Including without limitation any theses, research proposals, research summaries, papers, articles, presentations or abstracts, drafts, comments and notes Including all laboratory notebooks or data in any form concerning the "student work."

REQUEST FOR PRODUCTION NO. 269:

All Documents and Electronic Data in Amgen's custody or control that were received from, collected from and/or previously in the possession of Dr. Eugene Goldwasser at any time or any person under his direction and/or control, concerning erythropoietin of any species, any erythropoietin analog, any erythropoietin mutant, and/or Amgen.

REQUEST FOR PRODUCTION NO. 270:

All Documents and Electronic Data Including any Communications Concerning any archive or other depository of Documents Concerning Dr. Eugene Goldwasser's work on erythropoietin.

REQUEST FOR PRODUCTION NO. 271:

All Documents and Electronic Data Concerning any agreement, collaboration, negotiation or communication of any kind between Amgen and Dr. Eugene Goldwasser, or between Amgen and any other person acting on Dr. Goldwasser's behalf, Including the University of Chicago, from 1975 through the present, Including without limitation:

(a) collaborations, consulting agreements, research agreements and research grants concerning human EPO;

(b) collaborations, consulting agreements, research agreements and research grants concerning any non-human EPO;

(c) collaborations, consulting agreements, research agreements and research grants concerning any EPO analogs or mutants;

(d) compensation, grants, gifts, stock or any other form of financial remuneration or benefit requested, obtained or received by Dr. Goldwasser or Dr. Goldwasser's laboratory from Amgen; and

(e) attempts or negotiations to enter into any such agreement or collaboration.

REQUEST FOR PRODUCTION NO. 272:

All Documents and Electronic Data Concerning any communications between Dr. Goldwasser and Amgen Concerning EPO, anemia, protein purification, cloning, compensation, Amgen's EPO patents from 1975 through present, and/or any collaboration between Dr. Goldwasser and Amgen concerning any of these topics.

REQUEST FOR PRODUCTION NO. 273:

All Documents and Electronic Data in Amgen's custody or control Concerning communications from 1975 through the present, between Dr. Goldwasser and any person Concerning the subject matter of Amgen's EPO patents, Including without limitation:

(a) the contribution of any person to that subject matter, Including without limitation, any examples in Amgen's EPO patents describing any cloning, purification, isolation and characterization of EPO;

(b) the prosecution of Amgen's EPO patents; and

(c) licensing or enforcement by Amgen or any licensee of Amgen of any rights

under Amgen's EPO patents.

REQUEST FOR PRODUCTION NO. 274:

All Documents and Electronic Data Concerning any sample(s) of human EPO in Dr. Goldwasser's possession or control, or in the possession or control of any person acting on Dr. Goldwasser's behalf, Including any such material used in Dr. Goldwasser's research, from 1975 through 1985 inclusive, Including without limitation:

(a) all documents in your possession or control concerning such samples;

(b) requests for any sample of such material from any person, Including communications between Dr. Goldwasser and any person concerning such requests, Including without limitation all documents in your possession or control concerning such requests; and

(c) any policies concerning responding to any such requests made to Dr. Goldwasser, Dr. Goldwasser's laboratory or to the University of Chicago for such material, Including without limitation all documents in your possession or control concerning such policies.

REQUEST FOR PRODUCTION NO. 275:

All Documents and Electronic Data Concerning any actual or proposed research, development and/or analysis by Dr. Goldwasser, Including any collaboration with any other person, Concerning EPO and Concerning:

(a) characterization of glycosylation of human EPO of any origin, Including without limitation monosaccharide content and pattern of glycosylation;

(b) prior to 1987, production of EPO from cultured cells of any type, variety or origin, Including without limitation the isolation, purification, quantification and in vitro and/or in vivo characterization of such material, and any communication with any person or entity regarding these activities.

REQUEST FOR PRODUCTION NO. 276:

All Documents and Electronic Data in Amgen's custody or control Concerning research grants and any other sponsored research, obtained or received by Dr. Goldwasser or used to support Dr. Goldwasser's laboratory or research, from any state and federal government agencies

or entities, or private entities from 1970 through 1985 inclusive, Including without limitation:

(a) any sponsored or supported research concerning EPO;

(b) any sponsored or supported research concerning any other chemical compound, either natural or synthetic, and known or thought to possess biological effects similar to EPO; and

(c) any sponsored or supported research concerning any design, production, purification, isolation, or in vitro or in vivo characterization of EPO analogs or mutants, and all documents in your possession or control that refer or relate to these activities.

REQUEST FOR PRODUCTION NO. 277:

All Documents and Electronic Data Concerning any actual or proposed research, development and/or analysis by Dr. Goldwasser, Including any collaboration with any other person, concerning design, production, purification, isolation, or in vitro or in vivo characterization of EPO analogs or mutants, and Including without limitation all documents in your possession or control that refer or relate to these activities.

REQUEST FOR PRODUCTION NO. 278:

All Documents and Electronic Data in Amgen's custody or control Concerning any collaboration by Dr. Goldwasser with any person other than Amgen, or consulting by Dr. Goldwasser for any person other than Amgen, from 1975 through 1985 inclusive, Including without limitation any offers or proposals for collaborating or consulting made to or received by Dr. Goldwasser, and concerning:

(a) EPO from any animal species; and

(b) any other chemical compound, either natural or synthetic, and known or thought to possess biological effects similar to EPO.

REQUEST FOR PRODUCTION NO. 279:

All Documents and Electronic Data Concerning any interactions and communications between Dr. Goldwasser and any person connected with University Patents, Inc., Including

without limitation Robert I. Siegel, Donald S. Sigal, and Samuel D. Golden, from 1975 through 1987 inclusive, and Including without limitation all documents in your possession or control that memorialize, evidence, or relate to any such interactions.

REQUEST FOR PRODUCTION NO. 280:

All Documents and Electronic Data in your possession and/or control concerning the policies and practices of the University of Chicago related to the distribution, retention, storage, archiving and destruction of any documents requested and/or provided according to this notice, Including the use of any electronic or digital means of storage such as any computer databases, disks or tapes.

REQUEST FOR PRODUCTION NO. 281:

All Documents and Electronic Data Concerning the article "*Efficiency of signaling through cytokine receptors depends critically on receptor orientation*" by Syed et al., Nature, 395, 1 October 1998, pp. 511-516, Including all documents related to the collaboration between Amgen and Axys Pharmaceuticals Inc. and between Amgen and the University of California at San Francisco related to the article and all documents concerning prior communications and collaborations between Amgen and Axys Pharmaceuticals Inc. and Amgen and Robert M. Stroud.

REQUEST FOR PRODUCTION NO. 282:

All Documents and Electronic Data Concerning the article "*NMR structure of human erythropoietin and a comparison with its receptor bound conformation*," Cheetham et al., Nature Structural Biology, vol. 5, , no. 10, October 1998, pp. 861-866.

REQUEST FOR PRODUCTION NO. 283:

All analysis and testing to determine the secondary and tertiary conformation of any EPO

product, Including Epogen®, Procrit®, Recormon®, or any modified EPO product, Including Aranesp®, Including any attempts to characterize the structure and any failures to characterize the structure of an EPO product or modified EPO product.

REQUEST FOR PRODUCTION NO. 284:

All Documents and Electronic Data Concerning testing, analysis, and modeling, Including computer modeling, to determine the secondary and tertiary conformation of any EPO product or modified EPO product, and any pegylated ESA, Including pegylated EPO and pegylated NESP.

REQUEST FOR PRODUCTION NO. 285:

All Documents and Electronic Data Concerning testing, analysis, and modeling, Including computer modeling, related to how EPO and CERA bind to cellular receptors, what receptors they bind to, the binding affinity of EPO and CERA for their respective receptors and how EPO and CERA initiate the production of red blood cells.

REQUEST FOR PRODUCTION NO. 286:

All Documents and Electronic Data Concerning testing, analysis, and modeling, Including computer modeling, related to how Aranesp® binds to cellular receptors, what receptors it binds to, the binding affinity of Aranesp® for its receptor and how Aranesp® initiates the production of red blood cells.

REQUEST FOR PRODUCTION NO. 287:

All Documents and Electronic Data, Including reports and notes, Concerning Communications between Amgen employees or agents and employees or agents of Health Care Providers between 1999 and the present Concerning long term contracts for Epogen®, future prices increases, most favored nation clauses, and future access to Amgen products.

REQUEST FOR PRODUCTION NO. 288:

All submissions by Amgen, any subsidiary, licensee or agents in proceedings before any court, administrative body or patent office related to EPO in Europe, Including Germany and the United Kingdom.

REQUEST FOR PRODUCTION NO. 289:

All Documents and Electronic Data Concerning Amgen's good faith basis for filing the present action, Including claim charts showing how Roche infringes every asserted claim.

REQUEST FOR PRODUCTION NO. 290:

All Documents and Electronic Data Concerning the construction of the all claim terms in the asserted patents, Including all documents that support Amgen's claim construction positions.

REQUEST FOR PRODUCTION NO. 291:

Contract templates and/or sample contracts sufficient to show the terms and conditions of agreements with Health Care Providers, or any group purchasing organizations, Concerning the purchase, manufacture, source or supply of any ESA product, Including Epogen® and/or Aranesp®, from 1999 to the present.

REQUEST FOR PRODUCTION NO. 292:

All contracts and agreements with Fresenius and DaVita from 1999 to the present.

REQUEST FOR PRODUCTION NO. 293:

Contract templates and/or sample contracts sufficient to show the terms and conditions of agreements with hospitals, or any group purchasing organizations for hospitals, in which discounts or rebates for the purchase of ESA products is linked, tied or bundled with the purchase of any other Amgen products from 1999 to the present.

REQUEST FOR PRODUCTION NO. 294:

All calendars and personal diaries of Leslie Mirani for 2005 and 2006.

REQUEST FOR PRODUCTION NO. 295:

All Documents and Electronic Data Concerning any knowledge of Amgen and/or its counsel or other representatives prior to April 2006 about any importation by Roche of CERA into the United States that did not fall within the uses protected by the safe harbor of 35 U.S.C. §271(e).

REQUEST FOR PRODUCTION NO. 296:

All Documents and Electronic Data Concerning any importation by Roche of CERA into the United States that did not fall within the uses protected by the safe harbor of 35 U.S.C. §271(e).

REQUEST FOR PRODUCTION NO. 297:

All Documents and Electronic Data Concerning any discussions or communications about whether Roche imported CERA into the United States for uses that were not protected by the safe harbor of 35 U.S.C. §271(e).

REQUEST FOR PRODUCTION NO. 298:

All Documents and Electronic Data Concerning the basis for Amgen's claim in the International Trade Commission in In the Matter of: Certain Products and Pharmaceutical Compositions Containing Recombinant Human Erythropoietin, filed April 11, 2006 ("ITC Investigation") that Roche's "importation and use" of CERA "in the United States infringes one or more claims" of the EPO Patents. (*See* ITC Am. Compl. 1.2).

REQUEST FOR PRODUCTION NO. 299:

All Documents and Electronic Data Concerning the basis for Amgen's claim in the ITC Investigation that "Roche is currently importing [CERA] for . . . imminent sale in the United States." (ITC Am. Compl. 7.1)

REQUEST FOR PRODUCTION NO. 300:

All Documents and Electronic Data Concerning the basis for Amgen's claim in the ITC Investigation that "Roche is offering for sale" CERA in the United States. (ITC Am. Compl. 7.2)

REQUEST FOR PRODUCTION NO. 301:

All Documents and Electronic Data Concerning the basis for Amgen's claim in the ITC Investigation that "Roche imports [CERA] for use and promotes the use of [CERA] by nephrologists and facilities that treat kidney dialysis patients in the United States." (ITC Am. Compl. 7.14)

REQUEST FOR PRODUCTION NO. 302:

All Documents and Electronic Data Concerning whether Amgen could obtain relief before the ITC absent importation by Roche of CERA into the United States that falls outside the safe harbor of 35 U.S.C. §271(e).

REQUEST FOR PRODUCTION NO. 303:

All Documents and Electronic Data Concerning any actual or potential sole source contract, requirements contract, or any form of exclusive dealing arrangement or similar arrangement, for the sale of any ESA product, Including Epogen® and/or Aranesp®, to any Health Care Provider, or group purchasing organization, Including internal memoranda and

emails and correspondence, from 1999 to the present.

REQUEST FOR PRODUCTION NO. 304:

All Documents and Electronic Data Concerning potential sales of ESA products by Roche, Including any discussions or communications Concerning the access of Roche to certain Amgen customers, or means or methods by which to dissuade, discourage or forestall any purchaser of ESA products from purchasing ESA products from Roche in the future.

REQUEST FOR PRODUCTION NO. 305:

All Documents and Electronic Data Concerning whether a claim, lawsuit or other legal or administrative proceeding for contributory infringement could or would be brought against a Health Care Provider, or any group purchasing organization, that purchases ESA products from Roche in the future, Including discussions or communications about Amgen informing any Health Care Provider that it could be subject to such a proceeding.

REQUEST FOR PRODUCTION NO. 306:

All Documents and Electronic Data Concerning any communication with a Health Care Provider, or any group purchasing organization, about whether a claim, lawsuit or other legal or administrative proceeding for contributory infringement could or would be brought against the Health Care Provider, or group purchasing organization, if it purchases ESA products from Roche in the future.

REQUEST FOR PRODUCTION NO. 307:

All Documents and Electronic Data Concerning any consequences (financial, access to product, or otherwise) to a Health Care Provider, or group purchasing organization, that purchases ESA products from Roche in the future, Including whether that Health Care Provider,

or group purchasing organization, would receive, or be entitled to, discounts on Amgen ESA products, whether that Health Care Provider, or group purchasing organization, would be able to purchase ESA products from Amgen, or whether there would be any other change in the terms and conditions of any agreement the Health Care Provider or group purchasing organization has or had with Amgen for the purchase of ESA products.

REQUEST FOR PRODUCTION NO. 308:

All Documents and Electronic Data Concerning topics or matters to be discussed with Health Care Providers, or any group purchasing organization, at any meeting of the National Renal Administrators Association held in 2006.

REQUEST FOR PRODUCTION NO. 309:

All Documents and Electronic Data Concerning any internal correspondence, Including emails, sent to or authored by Leslie Mirani during September to November 2006 regarding Amgen's customers for ESA products.

REQUEST FOR PRODUCTION NO. 310:

All Documents and Electronic Data, Including any internal Communications, memoranda, studies, charts, graphs, spreadsheets, or emails, Concerning CERA, potential sales of CERA, or any potential entry by Roche into the market (or markets) for ESA products.

REQUEST FOR PRODUCTION NO. 311:

All Documents and Electronic Data, Including any internal Communications, memoranda, studies, charts, graphs, spreadsheets, or emails, Concerning the potential entry of any Person or Entity other than Amgen or its Affiliates into the market (or markets) for ESA products from 1999 to the present.

REQUEST FOR PRODUCTION NO. 312:

All Documents and Electronic Data Concerning the reasons for linking, tying or bundling discounts or rebates for the purchase of ESA products with the purchase of any other Amgen products from 1999 to the present.

REQUEST FOR PRODUCTION NO. 313:

All Documents and Electronic Data Concerning the effect of any potential sales by Roche on the market (or markets) for ESA products for the treatment of patients with ESRD.

REQUEST FOR PRODUCTION NO. 314:

All Documents and Electronic Data Concerning the effect of any potential sales by Roche on the market (or markets) for ESA products for the treatment of patients with CKD.

REQUEST FOR PRODUCTION NO. 315:

All Documents and Electronic Data Concerning any relationship of government or private reimbursement for the use of ESA products to demand for, or any purchaser's willingness to procure (generally or from a particular manufacturer) those products.

DATED: January 8, 2007

F. HOFFMANN-LA ROCHE LTD,
ROCHE DIAGNOSTICS GMBH, and
HOFFMANN-LA ROCHE INC.

By its attorneys,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of this document was served upon the attorneys of record for the plaintiff (as listed below) by overnight mail on the above date.

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