

**REQUEST FOR PRODUCTION NO. 155:**

All Documents and Electronic Data that are public or otherwise not protected from disclosure by an applicable protective order Concerning Amgen, Inc., v. Thomas Scully and Tommy Thompson, Civ. A. No. 1:02CV02259, D.D.C., Including all draft and final versions of pleadings, all docketed documents and official correspondence and drafts of such documents; all memoranda of law and drafts of memoranda; Including also transcripts from depositions and interviews, interrogatories, responses and objections to interrogatories, document requests, responses and objections to document requests, requests for answers and responses and objections to answers; expert reports; subpoenas; all Documents and other Things relied upon as demonstrative exhibits or evidence at trial; all external references relied upon; and any other Document, Electronic Data, or Communication related to this action as well as any other Document, Electronic Data, or Communication related to any subsequent appeals or adjudications arising from the aforementioned civil action.

**REQUEST FOR PRODUCTION NO. 156:**

All Documents and Electronic Data that are public or otherwise not protected from disclosure by an applicable protective order Concerning the arbitration before the America Arbitration Association, No. 51 13300242 97, between Ortho-Biotech, Inc. and Ortho-McNeil Pharmaceutical Corp. as claimants and Amgen and Kirin-Amgen, Inc. as respondents, Including all draft and final versions of forms submitted to the arbitrators, all docketed documents and official correspondence and drafts of such documents; all memoranda of law and drafts of memoranda; Including also transcripts from depositions and interviews, all discovery Including interrogatories, responses and objections to interrogatories, document requests, responses and objections to document requests, requests for answers and responses and objections to answers;

expert reports; subpoenas; all Documents and other Things relied upon as demonstrative exhibits or evidence in the arbitration; all external references relied upon; and any other Document, Electronic Data, or Communication related to this action as well as any other Document, Electronic Data, or Communication related to any subsequent appeals or adjudications arising from the aforementioned arbitration.

**REQUEST FOR PRODUCTION NO. 157:**

All Documents and Electronic Data that are public or otherwise not protected from disclosure by an applicable protective order Concerning Ortho Biotech Products, L.P. v. Amgen, Inc., Civ. A. No. 3:05-cv-04850-SRC-JJH, D.N.J., Including all draft and final versions of pleadings, all docketed documents and official correspondence and drafts of such documents; all memoranda of law and drafts of memoranda; Including also transcripts from depositions and interviews, interrogatories, responses and objections to interrogatories, document requests, responses and objections to document requests, requests for answers and responses and objections to answers; expert reports; subpoenas; all Documents and other Things relied upon as demonstrative exhibits or evidence at trial; all external references relied upon; and any other Document, Electronic Data, or Communication related to this action as well as any other Document, Electronic Data, or Communication related to any subsequent appeals or adjudications arising from the aforementioned civil action.

**REQUEST FOR PRODUCTION NO. 158:**

All Documents and Electronic Data that are public or otherwise not protected from disclosure by an applicable protective order Concerning proceedings Concerning recombinant human erythropoietin in the United Kingdom Including Kirin-Amgen, Inc. v. Hoechst Marion Roussel Ltd, EWCA Civ 1096 (2002), Kirin-Amgen, Inc. v. Hoechst Marion Roussel Ltd, IP &

T 694 Civ 1096 (2003), and Kirin-Amgen, Inc. v. Hoechst Marion Roussel Ltd, UKHL 46 (2004), Including all draft and final versions of pleadings, all docketed documents and official correspondence and drafts of such documents; all memoranda of law and drafts of memoranda; Including also transcripts from depositions and interviews, interrogatories, responses and objections to interrogatories, document requests, responses and objections to document requests, requests for answers and responses and objections to answers; expert reports; subpoenas; all Documents and other Things relied upon as demonstrative exhibits or evidence at trial; all external references relied upon; and any other Document, Electronic Data, or Communication related to this action as well as any other Document, Electronic Data, or Communication related to any subsequent appeals or adjudications arising from the aforementioned civil action.

**REQUEST FOR PRODUCTION NO. 159:**

All Testimony of experts Concerning to the subject matter disclosed and/or claimed in Amgen's EPO patents that is public or otherwise not protected from disclosure by an applicable protective order.

**REQUEST FOR PRODUCTION NO. 160:**

All Testimony of any person Concerning the validity, enforceability, invalidity, unenforceability, inventorship and/or construction or scope of any claim of Amgen's EPO patents that is public or otherwise not protected from disclosure by an applicable protective order.

**REQUEST FOR PRODUCTION NO. 161:**

All Testimony of any person Concerning the subject matter claimed and/or disclosed in the Amgen EPO patents that is public or otherwise not protected from disclosure by an applicable protective order.

**REQUEST FOR PRODUCTION NO. 162:**

Documents and Electronic Data sufficient to identify all corporate entities related to Amgen, Inc., Including Kirin-Amgen, Inc. and any other foreign entities, and Including any and all parent and/or subsidiary entities that may have existed (and may not exist now) from Amgen's first incorporation to Nov. 8, 2005, Including but not limited to any corporate trees.

**REQUEST FOR PRODUCTION NO. 163:**

Documents and Electronic Data sufficient to identify any transfers, assignments, licensing agreements, research agreements, development agreements, and the like made between or among any Amgen entity(ies) (corporate or otherwise) concerning technology that embodies the disclosure or invention in the specification of Amgen's EPO patents.

**REQUEST FOR PRODUCTION NO. 164:**

All Documents and Electronic Data that identify the recording of any transfers, assignments, licensing agreements, research agreements, development agreements, and the like with the PTO, concerning Amgen's EPO patents.

**REQUEST FOR PRODUCTION NO. 165:**

All Documents and Electronic Data reflecting internal correspondence or external correspondence between Amgen and any other person or entity regarding quantification of erythropoietin biological activity.

**REQUEST FOR PRODUCTION NO. 166:**

All Documents and Electronic Data reflecting internal correspondence or external correspondence between Amgen and any other person or entity regarding an international standard for erythropoietin.

**REQUEST FOR PRODUCTION NO. 167:**

All Documents and Electronic Data, Including scientific data, lab notebooks, letters, notes, memoranda, summaries and presentations, Including drafts of said documents, further Including internal correspondence or external correspondence between Amgen and any other person or entity regarding Amgen's efforts to produce a form of erythropoietin that would not infringe any claimed invention or the claims of any application filed with the PTO by a third party, Including but not limited to Genetics Institute.

**REQUEST FOR PRODUCTION NO. 168:**

All Documents and Electronic Data Concerning testing of Amgen's recombinant human erythropoietin by the United Kingdom's National Institute for Biological Standards and Control ("NIBSC"), Including documents demonstrating the results, summaries or synopses of any scientific tests performed on Lots 502, 503, 505 and 514.

**REQUEST FOR PRODUCTION NO. 169:**

All Documents and Electronic Data Concerning assays or tests performed on Amgen's recombinant human erythropoietin by Dr. Patrick L. Storrington from 1985 through 1997.

**REQUEST FOR PRODUCTION NO. 170:**

All correspondence between Amgen and Charles F. Goochee concerning glycosylation patterns on recombinantly produced polypeptides, Including but not limited to human erythropoietin, from 1988 through 1992, Including all documents concerning communications between Dr. Goochee and Boehringer Mannheim relating to glycosylation patterns on recombinantly produced polypeptides.

**REQUEST FOR PRODUCTION NO. 171:**

All Documents and Electronic Data, Including scientific data, lab notebooks, letters,

notes, memoranda, summaries and presentations, including drafts of said documents, that reflect work done by Peter Dukes for Amgen regarding the pharmacokinetics in humans of human erythropoietin or any other erythropoiesis stimulating agent between 1980 and 1995.

**REQUEST FOR PRODUCTION NO. 172:**

All Documents and Electronic Data, including lab notebooks, letters, notes, memoranda, reflecting Amgen's awareness of the erythropoietin supply maintained by Eugene Goldwasser at any time.

**REQUEST FOR PRODUCTION NO. 173:**

All Documents and Electronic Data, including scientific data, lab notebooks, letters, notes, memoranda, summaries and presentations, that demonstrate studies or analyses performed on Amgen-produced or manufactured erythropoietin.

**REQUEST FOR PRODUCTION NO. 174:**

All Documents and Electronic Data, including contracts, addenda to contracts, letters, memoranda, notes and personal correspondence, including drafts of said documents, sufficient to demonstrate proper assignment and proper recording of said assignment of the Amgen patents between any person or entity from Dec. 13, 1983 to the present.

**REQUEST FOR PRODUCTION NO. 175:**

All Documents and Electronic Data, including scientific data, lab notebooks, letters, notes, memoranda, summaries and presentations, including drafts of said documents, mentioning, discussing or analyzing a 1988 manuscript by James H. Shinaberger, M.D., et al., entitled "Erythropoietin Alert: Risks of High Hematocrit," including communications between Amgen and any other party, including regulatory agencies, concerning said manuscript.

**REQUEST FOR PRODUCTION NO. 176:**

All internal correspondence and drafts Concerning Amgen's Oct. 28, 1987 press release titled "Amgen Awarded Patent on Human Recombinant Erythropoietin."

**REQUEST FOR PRODUCTION NO. 177:**

All Documents and Electronic Data, Including scientific data, lab notebooks, letters, notes, memoranda and presentations that concern studies performed by Amgen or any other third party to analyze the glycosylation of human erythropoietin of any source, Including purified urinary erythropoietin or recombinant erythropoietin produced from any host cell.

**REQUEST FOR PRODUCTION NO. 178:**

All Documents and Electronic Data, Including contracts, addenda to contracts, letters, memoranda, notes and personal correspondence, Including drafts of said documents, between Amgen and any other person or entity, relating to Amgen's planned or actual construction of a 40,000 sq. ft production facility near the University of Illinois Chicago campus.

**REQUEST FOR PRODUCTION NO. 179:**

All internal correspondence and drafts Concerning Amgen's May 2, 1984 press release titled "Amgen Hires Construction Manager for 40,000 Sq. Ft. Chicago Plant."

**REQUEST FOR PRODUCTION NO. 180:**

All correspondence between Amgen and Davy McKee, Inc. Concerning construction of a 40,000 sq. ft production facility near the University of Illinois Chicago campus.

**REQUEST FOR PRODUCTION NO. 181:**

All Documents and Electronic Data reflecting internal correspondence or external correspondence between Amgen and any other person or entity regarding preparation of an article titled "Comparative Studies of Natural and Recombinant Human Erythropoietin" by



Daniel Vapnek, et al., published in 1987 in volume 29 of the Banbury Report, Therapeutic Peptides and Proteins: Assessing the New Technologies.

**REQUEST FOR PRODUCTION NO. 182:**

All Documents and Electronic Data, Including presentations and associated drafts, notes, memoranda or texts (and drafts) of any speeches delivered, relating to an article titled “Comparative Studies of Natural and Recombinant Human Erythropoietin” by Daniel Vapnek, et al., published in 1987 in volume 29 of the Banbury Report, Therapeutic Peptides and Proteins: Assessing the New Technologies.

**REQUEST FOR PRODUCTION NO. 183:**

All Documents and Electronic Data, Including scientific data, lab notebooks, letters, notes, memoranda, summaries and presentations, Including drafts of said documents, further Including internal correspondence or external correspondence between Amgen and any other person or entity regarding samples of erythropoietin supplied from any person or entity in Italy, Including but not limited to Drs. William Dowd, Giovanni Cassani, Bill Riley, Peter Lewis, Ken Loerscher, or entities named “Dow,” “Cordis-Dow,” “Lepetit,” or “Gruppo Lepetit, S.p.A.”

**REQUEST FOR PRODUCTION NO. 184:**

All Documents and Electronic Data, Including scientific data, lab notebooks, letters, notes, memoranda, summaries and presentations, Including drafts of said documents, further Including internal correspondence or external correspondence between Amgen and any other person or entity regarding Amgen’s efforts to purify erythropoietin from human urine.

**REQUEST FOR PRODUCTION NO. 185**

All internal and external correspondence to or from Howell Stebbing regarding recombinant human erythropoietin from 1981 to 1985.



**REQUEST FOR PRODUCTION NO. 186:**

All Documents and Electronic Data, Including scientific data, lab notebooks, letters, notes, memoranda, summaries and presentations, Including drafts of said documents, further Including internal correspondence or external correspondence between Amgen and any other person or entity regarding production of erythropoietin from 1411H human testicular germ cells.

**REQUEST FOR PRODUCTION NO. 187:**

All correspondence between Amgen and Franklin Gaylis Concerning human erythropoietin from 1980 through the present.

**REQUEST FOR PRODUCTION NO. 188:**

All correspondence between Amgen and Joao Ascensao Concerning human erythropoietin from 1980 through the present.

**REQUEST FOR PRODUCTION NO. 189:**

All correspondence between Amgen and Esmail Zanjani Concerning human erythropoietin from 1980 through the present.

**REQUEST FOR PRODUCTION NO. 190:**

All Documents and Electronic Data, Including scientific data, lab notebooks, letters, notes, memoranda, summaries and presentations, Including drafts of said documents, further Including internal correspondence or external correspondence between Amgen and any other person or entity regarding use of an oocyte translation system for expression of erythropoietin.

**REQUEST FOR PRODUCTION NO. 191:**

All correspondence between Amgen and Irving Weissman regarding testing, experiments or other scientific information gathering on human erythropoietin between 1980 and 1985.

**REQUEST FOR PRODUCTION NO. 192:**

All Documents and Electronic Data, Including scientific data, lab notebooks, letters, notes, memoranda, summaries and presentations, Including drafts of said documents, further Including internal correspondence or external correspondence between Amgen and any other person or entity regarding any attempt by Amgen to use messenger RNA to express monkey or human erythropoietin.

**REQUEST FOR PRODUCTION NO. 193:**

All internal communications, letters, memoranda, reports, presentations and summaries sufficient to describe the development of AMG 114 and its current status.

**REQUEST FOR PRODUCTION NO. 194:**

All Documents and Electronic Data relating to the use of any “sequenator,” “microsequenator,” “gas-liquid phase machine,” or any other “gas-phase” peptide sequencing device at Amgen from 1980 through 1985.

**REQUEST FOR PRODUCTION NO. 195:**

Documents and Electronic Data sufficient to identify the origin, manufacture, design, operation and current location or status of any “sequenator,” “microsequenator,” “gas-liquid phase machine,” or any other “gas-phase” peptide sequencing device used at Amgen from 1980 through 1985.

**REQUEST FOR PRODUCTION NO. 196:**

All correspondence between Amgen and Leroy Hood regarding protein sequencing methods between 1980 and 1984.

**REQUEST FOR PRODUCTION NO. 197:**

All correspondence between Amgen and Rodney Hewick regarding protein sequencing

methods between 1980 and 1984.

**REQUEST FOR PRODUCTION NO. 198:**

All Documents and Electronic Data Concerning Amgen's understanding of a recombinant human erythropoietin produced by Amersham.

**REQUEST FOR PRODUCTION NO. 199:**

All internal correspondence, and all correspondence between Amgen and Abbott Laboratories or any of its agents Including Eugene Goldwasser concerning human embryonic kidney cells that secrete human erythropoietin from 1980 through the present.

**REQUEST FOR PRODUCTION NO. 200:**

All Documents and Electronic Data, Including scientific data, lab notebooks, letters, notes, memoranda, summaries and presentations, Including drafts of said documents, further Including internal correspondence or external correspondence between Amgen and any other person or entity regarding use of a human embryonic kidney cell line or any cDNA library that may have been created from mRNA extracted from human embryonic kidney cells.

**REQUEST FOR PRODUCTION NO. 201:**

Documents and Electronic Data sufficient to identify each and every shipment of human erythropoietin or human erythropoietin fragments from Eugene Goldwasser to Amgen between 1980 and 1987.

**REQUEST FOR PRODUCTION NO. 202:**

All correspondence between Amgen and Marty Cline regarding alternate routes for looking for the EPO message.

**REQUEST FOR PRODUCTION NO. 203:**

All Documents and Electronic Data, Including scientific data, lab notebooks, letters,

notes, memoranda, summaries and presentations, including drafts of said documents, further including internal correspondence or external correspondence between Amgen and any other person or entity regarding Amgen's attempts to obtain the human erythropoietin protein sequence from 1980 through 1984.

**REQUEST FOR PRODUCTION NO. 204:**

All agenda, minutes, notes and memoranda concerning a meeting at Amgen on Tuesday, April 28, 1981 attended by Eugene Goldwasser, including all materials distributed or presented at that meeting, further including any personal notes taken by any attendee of that meeting.

**REQUEST FOR PRODUCTION NO. 205:**

All agenda, minutes, notes and memoranda concerning a meeting at Amgen on Friday, May 22, 1981 attended by Abbott Laboratories, including all materials distributed or presented at that meeting, further including any personal notes taken by any attendee of that meeting.

**REQUEST FOR PRODUCTION NO. 206:**

All agenda, minutes, notes and memoranda concerning Eugene Goldwasser's visit to Amgen on or about Friday, August 12, 1983, including any materials distributed or presented by Eugene Goldwasser or Amgen or its employees or agents during that visit, and all documents sufficient to identify those Amgen employees or agents who may have met with Dr. Goldwasser.

**REQUEST FOR PRODUCTION NO. 207:**

All agenda, minutes, notes and memoranda relating to human erythropoietin that concern a scientific advisory board meeting at Amgen on June 16-17, 1981 including all materials distributed or presented at that meeting, further including any personal notes taken by any attendee of that meeting.

**REQUEST FOR PRODUCTION NO. 208:**

All Documents and Electronic Data reflecting internal correspondence or external correspondence between Amgen and any other person or entity regarding the technology embodied in U.S. Patent No. 4,179,337, or any communications regarding licensing of U.S. Patent No. 4,179,337.

**REQUEST FOR PRODUCTION NO. 209:**

Documents and Electronic Data sufficient to fully describe Amgen's specific role and responsibilities in the co-development of SD/01 with Roche.

**REQUEST FOR PRODUCTION NO. 210:**

All Documents and Electronic Data, Including laboratory notebooks, raw data, reports, memoranda, meeting minute notes, research proposals and requests for proposals and correspondence generated between January 1, 1997 and January 1, 2000 and related to Amgen's collaboration with Roche pursuant to agreement executed on or around April 10, 1997 between Roche, Kyowa, Kirin, and Amgen.

**REQUEST FOR PRODUCTION NO. 211:**

All Documents and Electronic Data, Including scientific data, lab notebooks, letters, notes, memoranda, summaries and presentations, Including drafts of said documents, sufficient to demonstrate the specific contribution of the following Amgen employees to the development of SD/01: Aart Brouwer, Ronald Lorijn, Thomas Hecht, Maureen Graham, Julie Hartley, Wayne Pearl, Carsten Thiel, and George Morrow.

**REQUEST FOR PRODUCTION NO. 212:**

All Documents and Electronic Data, Including scientific data, lab notebooks, letters, notes, memoranda, summaries and presentations, Including drafts of said documents, concerning

Amgen's evaluation of Roche proprietary products having the name "ND28," "Ro-25-8315" or "PEGG."

**REQUEST FOR PRODUCTION NO. 213:**

All Documents and Electronic Data, Including scientific data, lab notebooks, letters, notes, memoranda, summaries and presentations, Including drafts of said documents, demonstrating physical or chemical similarities between erythropoietin and any other hematopoiesis protein.

**REQUEST FOR PRODUCTION NO. 214:**

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 pegylation of a "hematopoietic protein" claimed in U.S. Patent No. 7,090,835.

**REQUEST FOR PRODUCTION NO. 215:**

All communications between Amgen AG, Amgen Lucerne, Amgen-Kirin, or Dompé and Roche concerning development of a pegylated G-CSF product.

**REQUEST FOR PRODUCTION NO. 216:**

All Documents and Electronic Data Concerning the Amgen-Roche collaboration "AMRO" between the years 1989 and 2002.

**REQUEST FOR PRODUCTION NO. 217:**

All Documents and Electronic Data Concerning the Amgen-Roche collaboration "AMRO" between the years 1989 and 2002 concerning properties of various forms of pegylated G-CSF.

**REQUEST FOR PRODUCTION NO. 218:**

All Documents and Electronic Data Concerning the Amgen-Roche collaboration

“AMRO” between the years 1989 and 2002 sufficient to identify Amgen employees and or agents participating in co-development of a pegylated G-CSF product with Roche.

**REQUEST FOR PRODUCTION NO. 219:**

All contracts, including amendments, renewals, rescissions, and drafts, markups and redlines between Amgen and Roche concerning G-CSF or any pegylated G-CSF molecule product.

**REQUEST FOR PRODUCTION NO. 220:**

All licensing agreements, including amendments, renewals, rescission and drafts, markups and redlines between Amgen and Roche concerning G-CSF or any pegylated G-CSF molecule or product.

**REQUEST FOR PRODUCTION NO. 221:**

All correspondence and communication between Amgen and Douglas Lauffenburger or Casim Sarkar of the Massachusetts Institute of Technology concerning interactions of pegylated proteins with receptor proteins.

**REQUEST FOR PRODUCTION NO. 222:**

All correspondence and communication between Amgen and Alec Gross or Harvey Lodish of the Massachusetts Institute of Technology concerning analyses of interactions of erythropoietin or hyperglycosylated erythropoietin and receptor proteins.

**REQUEST FOR PRODUCTION NO. 223:**

All Documents and Electronic Data reflecting internal correspondence or external correspondence between Amgen and any other person or entity regarding protein sequencing methods between 1980 and 1984.



**REQUEST FOR PRODUCTION NO. 224:**

All Documents and Electronic Data Concerning communications between Amgen and Joseph Baron that refer or relate to the clinical study of purified human erythropoietin.

**REQUEST FOR PRODUCTION NO. 225:**

All Documents and Electronic Data Concerning communications between Amgen and Dimitrios Emmanouel that refer or relate to the clinical study of purified human erythropoietin.

**REQUEST FOR PRODUCTION NO. 226:**

All Documents and Electronic Data Concerning communications between Amgen and Adrian Katz that refer or relate to the clinical study of purified human erythropoietin.

**REQUEST FOR PRODUCTION NO. 227:**

All internal correspondence and external correspondence between Amgen and any consultants, collaborators, or agents concerning the identification, presentation, analysis, or summary of the use of human erythropoietin of any origin in humans from 1980 through 1987.

**REQUEST FOR PRODUCTION NO. 228:**

All internal correspondence and external correspondence between Amgen and any consultants, collaborators, or agents concerning the identification, presentation, analysis, or summary of the use of human erythropoietin of any origin in humans to treat disease from 1980 through 1987.

**REQUEST FOR PRODUCTION NO. 229:**

All correspondence between Amgen and John Adamson 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. 230:**

All correspondence between Amgen and Stefan Constantinescu 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. 231:**

All correspondence between Amgen and Eric Gaier 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. 232:**

All correspondence between Amgen and Benjamin Scher 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. 233:**

All correspondence between Amgen and Christopher Stromberg 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. 234:**

All correspondence between Amgen and Charles Weissman 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. 235:**

All correspondence between Amgen and John Kuriyan 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. 236:**

All correspondence between Amgen and Axel Ullrich 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. 237:**

All correspondence between Amgen and Randolph Wall 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. 238:**

All correspondence between Amgen and Richard Cummings 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. 239:**

All correspondence between Amgen and Stuart Orkin 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. 240:**

All correspondence between Amgen and Lawrence Chasin 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. 241:**

All correspondence between Amgen and J. P. Kamerling 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. 242:**

All correspondence between Amgen and Sydney Brenner 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. 243:**

All correspondence between Amgen and Michael Gait 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. 244:**

All correspondence between Amgen and Nicholas Proudfoot 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.