

Goldwasser, Eugene Ph.D.

2/14/2007

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

Certified Copy

AMGEN INC.,)	
Plaintiff,)	
vs.)	No. 05-12237 WGY
F. HOFFMANN-LA ROCHE LTD., a)	
Swiss Company, ROCHE DIAGNOSTICS)	
GmbH, a German Company, and)	
HOFFMANN-LA ROCHE INC., a New)	
Jersey Corporation,)	
Defendants.)	

Videotaped Deposition of

EUGENE GOLDWASSER, Ph.D., taken before GREG S. WEILAND, CSR, RMR, CRR, Notary Public, pursuant to the Federal Rules of Civil Procedure for the United States District Court pertaining to the taking of depositions, at Suite 4100, Three First National Plaza, in the City of Chicago, Cook County, Illinois, commencing at 9:13 o'clock a.m., on the 14th day of February, 2007.

*** PAGE 119 THROUGH AND INCLUDING PAGE 121 ***

*** WERE DESIGNATED CONFIDENTIAL ***

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1 over time.

2 A. No.

3 Q. Have you had any -- let me ask the
4 question again.

5 Q. I mean with regard to acting as an
6 expert or a fact witness in the various litigations,
7 has the Marshall law firm or Mr. Borun ever
8 represented you?

9 A. No.

10 Q. When we talk about epo, can you tell us
11 what epo is?

12 MR. FLOWERS: Objection, vague and
13 ambiguous.

14 THE WITNESS: I don't know what kind of
15 definition you want. I can give you a biological
16 definition, I can give you a chemical definition.

17 BY MS. BEN-AMI:

18 Q. Well, why don't you give me --

19 A. I can give you an endocrinological one.
20 It's not a precise question.

21 Q. Well, what is the chemical definition of
22 epo?

23 A. It's a glycoprotein of a molecular size,
24 at least human erythropoietin, a molecular size of
25 about 30,000 consisting of 165 amino acids in linear

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1 array and about 39 or 40 percent polysaccharide
2 attached to the protein.

3 Q. Okay. And what's your biological
4 definition?

5 A. It's a hormone that regulates the rate of
6 red blood cell formation in mammals.

7 Q. And can you just again tell us what a
8 hormone is?

9 A. A hormone is a substance made in one part
10 of a complex organism like a mammal, secreted into
11 the circulation and acts at another part.

12 Q. When did you first -- you're comfortable
13 with us using the term epo?

14 A. Yes. I invented the term, so ...

15 Q. So you should be very comfortable because
16 it's got a long name otherwise, and it's much -- the
17 court reporter will be much happier with epo.

18 When did you invent the term epo?

19 A. I can't give you a date.

20 Q. Give me a decade.

21 A. The name -- what?

22 Q. Can you give me a decade?

23 A. Yes, in the '60s I think.

24 Q. Okay.

25 A. The name was given by a Finnish biologist,