

EXHIBIT B

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February 16, 2007

VIA FACSIMILE AND E-MAIL

Patricia A. Carson, Esq.
Kaye Scholer LLP
425 Park Avenue
New York, NY 10022-3598

Re: *Amgen Inc. v. F. Hoffmann-La Roche Ltd., et al.*
Case No. 05 Civ. 12237 WGY

Dear Pat:

I write in response to Roche's First Notice of Deposition to Amgen Pursuant to Rule 30(b)(6), served by facsimile on February 9, 2007.

First, the service is apparently defective as I am not aware of any agreement between the parties to accept service by facsimile.

Second, the Notice contains an instruction that Amgen is to respond by Tuesday, February 20, 2007, with an identification of the individuals that will testify on each category. I am not aware of any such requirement in Rule 30. Furthermore, it is quite clear that many of the categories are objectionable on their face as they lack reasonable particularity, among other issues.

We will be serving objections on Roche next week. After you have had the opportunity to review, we can certainly meet and confer. Needless to say, with the number of issues this overbroad and defective notice presents, we will not be appearing for deposition on February 27, 2007.

Please contact me if you wish to discuss further. Otherwise, we will serve the objections next week and will proceed from there.

Very truly yours,

/s/William G. Gaede, III

William G. Gaede, III

cc: Mike Gottfried, Esq.
Krista Carter, Esq.
Sandip H. Patel, Esq.