

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
AMGEN INC.,)	
)	
Plaintiff,)	
)	
vs.)	
)	CIVIL ACTION No.: 05-CV-12237WGY
F. HOFFMANN-LA ROCHE LTD;)	
ROCHE DIAGNOSTICS GmbH; and)	
HOFFMANN-LA ROCHE INC.)	
)	
Defendants.)	
_____)	

**DECLARATION OF KEITH E. TOMS IN SUPPORT OF DEFENDANTS'
MOTION TO ENFORCE THE COURT'S MARCH 27, 2007 ORDER AND TO COMPEL
DEPOSITION TESTIMONY UNDER RULE 30(B)(6)**

I, Keith E. Toms, declare under penalty of perjury that:

I am an attorney at the law firm of Bromberg & Sunstein LLP and am admitted to the Bar of the State of Massachusetts. I am counsel for Defendants in the above-referenced case.

I make this declaration in support of the Defendants' Motion to Enforce the Court's March 27, 2007 Order and to Compel Deposition Testimony Under Rule 30(b)(6), dated April 13, 2007.

Attached hereto as Exhibit A is a true and correct copy of a letter from Vladimir Drozdoff to William G. Gaede III, dated March 8, 2007.

Attached hereto as Exhibit B is a true and correct copy of excerpts from the deposition of Stuart Watt taken on March 29, 2007 in Westlake Village, California.

Attached hereto as Exhibit C is a true and correct copy of a letter from William G. Gaede III to Vladimir Drozdoff, dated March 13, 2007.

Attached hereto as Exhibit D is a true and correct copy of excerpts from the deposition of Fu-Kuen Lin taken on March 28, 2007 in Westlake Village, California.

Attached hereto as Exhibit E is a true and correct copy of excerpts from the deposition of Thomas Charles Boone taken on March 30, 2007 in Los Angeles, California.

Attached hereto as Exhibit F is a true and correct copy of excerpts from the deposition of Thomas Wayne Strickland taken on March 9, 2007 in Los Angeles, California.

Executed this 13th day of April 2007 at Boston, Massachusetts.

/s/ Keith E. Toms
Keith E. Toms

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and, due to the federal holiday, paper copies will be sent to those indicated as non-registered participants on the above-referenced date.

/s/ Keith E. Toms
Keith E. Toms

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