

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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

**Exhibit F in Support of Defendants’ Motion to Enforce the
Court’s March 27, 2007 Order and to Compel Deposition
Testimony Under Rule 30(b)(6)**

Roche is filing this document in the public record pursuant to paragraph 14 of the Protective Order. Amgen did not file a motion as to why the information is confidential trade secret material within the (4) Court day period of Roche’s in camera submission, as required by paragraph 14.

Dated: April 20, 2007
Boston, Massachusetts

/s/ Keith E. Toms
Lee Carl Bromberg (BBO# 058480)
Julia Huston (BBO# 562160)
Keith E. Toms (BBO# 663369)
Nicole A. Rizzo (BBO# 663853)
BROMBERG & SUNSTEIN LLP
125 Summer Street
Boston, MA 02110
Tel. (617) 443-9292
ktoms@bromsun.com

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3/9/2007 Strickland, Thomas

Exhibit F

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UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

AMGEN, INC.,

Plaintiff,

v.

Civil Action No.
05-CV-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.

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CONFIDENTIAL VIDEOTAPED  
DEPOSITION OF THOMAS WAYNE STRICKLAND  
VOLUME I  
LOS ANGELES, CALIFORNIA  
MARCH 9, 2007

(This transcript is  
designated CONFIDENTIAL as per  
Section 5(c) of the Amended  
Protective Order. Please treat  
the entire transcript in  
accordance with the protective  
order.)

Reported by: Harry Alan Palter, C.S.R. NO. 7708

3/9/2007 Strickland, Thomas

1 significant expense and effort, excellent color  
2 copies of many pages of Dr. Strickland's lab  
3 notebooks. And so you have had a chance to  
4 review very good copies for quite a while now  
5 and, therefore, we think that you've had an  
6 adequate opportunity to review Dr. Strickland's  
7 materials before this deposition.

8 MR. JAGOE: Well, I'll just make a  
9 quick response. Not that one is necessary, but  
10 it should be known that Dr. Strickland was  
11 noticed for deposition several weeks ago, and  
12 it was only on March 6th when you identified  
13 him as a 30(b)(6) witness, and it was only last  
14 night when you supplemented your Rule 26  
15 disclosures, identifying Dr. Strickland as a  
16 person having certain knowledge in certain  
17 areas.

18 And we agreed yesterday we would try  
19 to finish today. If we don't finish today, we  
20 will continue at another time.

21 It's not Amgen's decision whether or  
22 not Dr. Strickland will appear. That will be  
23 decided by the Court, if an agreement can't be  
24 reached.

25 So we'll proceed with the deposition.

3/9/2007 Strickland, Thomas

1 through the questions. But 10 hours in one day  
2 is enough for any witness.

3 So --

4 MR. JAGOE: You said you would stay  
5 late to finish and go beyond 7 hours. We  
6 haven't -- only been 7 hours on the record yet.

7 DR. LOEB: I don't know how many  
8 hours we've been on the record, but we've been  
9 here for 10 hours.

10 MR. JAGOE: How many hours have we  
11 been on the record?

12 DR. LOEB: Would you like to start  
13 again on Monday morning?

14 MR. JAGOE: I can't agree to that.

15 THE VIDEOGRAPHER: 7 hours and  
16 23 minutes.

17 MR. JAGOE: We have another hour to  
18 go now. I'm willing to finish now.

19 DR. LOEB: I'm sorry.

20 We can't. It's been too long.

21 MR. JAGOE: Then we'll have to  
22 schedule another time.

23 Do you have any problems staying for  
24 another hour, Dr. Strickland?

25 DR. LOEB: Tom, it's time to go.

3/9/2007 Strickland, Thomas

1 Take your microphone off.

2 THE WITNESS: If they're leaving, I'm  
3 going with them.

4 MR. JAGOE: We'll have to meet again  
5 for the final topic of your 30(b)(6)  
6 deposition, then.

7 THE VIDEOGRAPHER: Are we going off  
8 the record, Counsel?

9 MR. JAGOE: Did you say how many  
10 hours we were on the record?

11 DR. LOEB: He did.

12 THE VIDEOGRAPHER: 7 hours and about  
13 25 minutes now.

14 MR. JAGOE: Okay.

15 We'll stay on the record, 'cause I'm  
16 going to ask some more questions.

17 DR. LOEB: You can ask them to an  
18 empty chair.

19 MS. WHITEFORD: Want to take the  
20 exhibits?

21 DR. LOEB: Yes.

22 These are for us.

23 (Mumbling)

24 THE REPORTER: I can't hear what  
25 you're saying.