

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA, *et al.*,  
*ex rel.* MICHAEL BAWDUNIAK,

Plaintiff-Relator,

v.

BIOGEN IDEC INC.,

Defendant.

Civil Action  
No. 12-10601-IT

**STIPULATION ON BIOGEN INC.'S MOTION TO COMPEL NON-PARTY  
GENZYME CORP. TO COMPLY WITH SUBPOENA REQUESTS 9 AND 15**

WHEREAS, on October 28, 2019, the Court entered an order (ECF No. 372) allowing in part and denying in part Biogen Inc.'s Motion to Compel Non-Party Genzyme Corp. to Comply with Subpoena Requests 9 and 15 (ECF No. 312);

WHEREAS, the Court ordered Genzyme "to comply with Request 9 of Biogen's subpoena consistent with the parameters Genzyme proposed in its Partial Opposition [ECF No. 324], as modified during the hearing" and, at the hearing, the Court directed the parties to propose written modifications as a proposed order;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for Biogen and Genzyme, that in response to Request No. 9 of Biogen's subpoena to Genzyme, Genzyme will produce only documents from Mr. Bawduniak's Genzyme email that concern:

1. Mr. Bawduniak's work at Biogen;
2. Information that Mr. Bawduniak has concerning Biogen, its conduct, its products, or its practices relating only to the period between January 1, 2009, and March 18, 2014; and/or
3. Mr. Bawduniak's lawsuit against Biogen.

BIOGEN INC.

GENZYME CORPORATION

By Its Attorneys,

By Its Attorneys,

/s/ Paul M. Kessimian

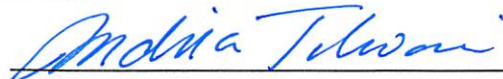
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PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: November 6, 2019

  
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HON. INDIRA TALWANI  
UNITED STATES DISTRICT JUDGE