

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF PENNSYLVANIA**

---

MYLAN PHARMACEUTICALS INC.,	)	
MYLAN SPECIALTY L.P., and MYLAN INC.,	)	
	)	
	)	Case No. 2:23-cv-00836-MRH
Plaintiffs,	)	
	)	
v.	)	
	)	Hon. Judge Hornak
SANOFI-AVENTIS U.S. LLC, SANOFI S.A.,	)	
AVENTIS PHARMA S.A.,	)	
and SANOFI-AVENTIS PUERTO RICO INC.,	)	
	)	
	)	
Defendants.	)	
	)	
	)	

---

**JOINT PROPOSED JURISDICTIONAL DISCOVERY PLAN**

Pursuant to the Court’s Order Granting in Part, Denying in Part, and Hold Decision in Abeyance in Part Defendants’ Motion to Dismiss dated January 27, 2026 (ECF No. 85), Mylan Pharmaceuticals Inc., Mylan Specialty L.P., and Mylan Inc. (collectively, “Plaintiffs”) and Defendants Sanofi S.A., Sanofi-Aventis U.S. LLC, Aventis Pharma S.A., and Sanofi-Aventis Puerto Rico Inc. (collectively, “Defendants”) have met and conferred, and submit this joint proposed jurisdictional discovery plan.

1. Plaintiffs have served their First Sets of Jurisdictional Discovery Requests for Production on Defendants on February 10, 2026, and Defendants’ deadline to serve objections and responses is March 12, 2026.
2. In connection with the Parties’ meet and confer efforts regarding this Joint Proposed Jurisdictional Discovery Plan, Defendants’ Counsel informed Plaintiffs that Sanofi S.A. and Aventis Pharma S.A. will take the position that they were not served with Plaintiffs’ First Set

of Jurisdictional Discovery Requests for Production and that proper service requires compliance with the procedures contemplated by the Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters (the “Hague Convention”). Defendants’ Counsel further informed Plaintiffs that Defendants’ Counsel would provide Sanofi S.A.’s and Aventis Pharma S.A.’s written position regarding the application of the Hague Convention promptly.

3. Defendants’ Counsel will provide Sanofi S.A.’s and Aventis Pharma S.A.’s written position regarding the application of the Hague Convention to Plaintiffs’ First Set of Jurisdictional Discovery Requests for Production to Sanofi S.A. and Plaintiffs’ First Set of Jurisdictional Discovery Requests for Production to Aventis Pharma S.A. by no later than February 18, 2026. The Parties will further meet and confer regarding the application of the Hague Convention to Plaintiffs’ First Set of Jurisdictional Discovery Requests for Production to Sanofi S.A. and Plaintiffs’ First Set of Jurisdictional Discovery Requests for Production to Aventis Pharma S.A. and will provide the Court with a further joint submission regarding the status of this issue by February 27, 2026.

4. The parties will meet and confer regarding an appropriate protective order to control discovery in this action and shall file a proposed protective order for the Court’s approval by no later than February 27, 2026.

5. The Parties shall meet and confer by March 19, 2026, regarding Defendants’ objections and responses to Plaintiffs’ First Sets of Jurisdictional Discovery Requests for Production as to all Defendants other than Sanofi S.A. and Aventis Pharma S.A. In the event disputes remain following this meet and confer, the parties shall contact the law clerk or Courtroom Deputy by March 26, 2026, to request a telephone status conference.

6. Defendants other than Sanofi S.A. and Aventis Pharma S.A. shall begin rolling productions of documents responsive to Plaintiffs’ First Sets of Jurisdictional Discovery Requests for Production by no later than March 30, 2026.

7. The last day for Plaintiffs to serve any further written jurisdictional discovery requests (limited to interrogatories or requests for admission) on Defendants other than Sanofi

S.A. and Aventis Pharma S.A. is April 17, 2026.<sup>1</sup>

8. Defendants other than Sanofi S.A. and Aventis Pharma S.A. shall substantially complete their production of jurisdictional discovery documents by no later than April 27, 2026.

9. The deposition period for jurisdictional discovery shall begin on May 4, 2026.<sup>2</sup>

10. Defendants other than Sanofi S.A. and Aventis Pharma S.A. shall produce privilege logs by no later than May 7, 2026.

11. Jurisdictional discovery shall be complete by May 27, 2026, i.e., 120 days from the Court's issuance of the Order Granting in Part, Denying in Part, and Hold Decision in Abeyance in Part Defendants' Motion to Dismiss (ECF No. 85).

12. The following chart reflects the parties' proposed schedule for jurisdictional discovery:

Event	Deadline
Plaintiffs served their First Sets of Jurisdictional Discovery Requests for Production on Defendants	February 10, 2026
Defendants' Counsel will provide Sanofi S.A.'s and Aventis Pharma S.A.'s written position regarding the application of the Hague Convention to Plaintiffs' First Set of Jurisdictional Discovery Requests for Production to Sanofi S.A. and Plaintiffs' First Set of Jurisdictional Discovery Requests for Production to Aventis Pharma S.A.	February 18, 2026
The Parties will further meet and confer regarding the application of the Hague Convention to Plaintiffs' First Set of Jurisdictional Discovery Requests for Production to Sanofi S.A. and Plaintiffs' First Set of Jurisdictional Discovery Requests for Production to	February 27, 2026

<sup>1</sup> Plaintiffs expressly reserve the right to seek leave to serve additional written Jurisdictional Discovery, including further Requests for Production.

<sup>2</sup> Plaintiffs reserve the right to seek leave to reopen any deposition should any dispute regarding Defendants' privilege logs necessitate doing so.

Aventis Pharma S.A. and will provide the Court with a further joint submission regarding the status of this issue	
The parties shall file a proposed protective order for the Court's approval	February 27, 2026
Last day for Defendants to serve objections and responses to Plaintiffs' First Sets of Jurisdictional Discovery Requests for Production	March 12, 2026
The parties shall meet and confer regarding Defendants' objections and responses to Plaintiffs' First Sets of Jurisdictional Discovery Requests for Production for all Defendants other than Sanofi S.A. and Aventis Pharma S.A.	March 19, 2026
If disputes remain, the parties shall contact the law clerk or Courtroom Deputy to request a telephone status conference	March 26, 2026
Last day for Defendants other than Sanofi S.A. and Aventis Pharma S.A. to begin rolling productions of documents responsive to Plaintiffs' First Sets of Jurisdictional Discovery Requests for Production	March 30, 2026
Last day for Plaintiffs to serve written discovery requests (limited to interrogatories or requests for admission) on Defendants other than Sanofi S.A. and Aventis Pharma S.A.	April 17, 2026
Defendants other than Sanofi S.A. and Aventis Pharma S.A. shall substantially complete their production of documents	April 27, 2026
Last day for Defendants other than Sanofi S.A. and Aventis Pharma S.A. to produce privilege logs	May 7, 2026
Deposition period for jurisdictional discovery begins	May 4, 2026
Deadline to complete jurisdictional discovery	May 27, 2026, <i>i.e.</i> , 120 days following the Court's Order Granting in Part, Denying in Part, and Hold Decision in Abeyance in Part Defendants' Motion to Dismiss (ECF No. 85)

13. To the extent the parties have any other disputes concerning jurisdictional discovery, they shall promptly meet and confer in good faith to attempt to reach a mutually agreeable resolution. In the event that the parties' good faith meet and confer efforts do not resolve the dispute, the parties will contact the Court to set a discovery conference before filing any motion to compel pursuant to Your Honor's Practices and Procedures.

February 17, 2026

Respectfully submitted,

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

By: /s/ Brendan J. Coffman

Seth C. Silber (admitted *pro hac vice*)  
Brendan J. Coffman (admitted *pro hac vice*)  
Rachel G. Gray (admitted *pro hac vice*)  
1700 K Street, NW, Fifth Floor  
Washington, D.C. 20006  
Telephone: (202) 973-8800  
Facsimile: (866) 974-7329  
Email: [ssilber@wsgr.com](mailto:ssilber@wsgr.com)  
Email: [bcoffman@wsgr.com](mailto:bcoffman@wsgr.com)  
Email: [rgray@wsgr.com](mailto:rgray@wsgr.com)

Stuart A. Williams (PA Bar No. 28063)  
WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation  
31 West 52nd Street, Fifth Floor  
New York, NY 10019  
Telephone: (212) 999-5800  
Facsimile: (866) 974-7329  
Email: [sWilliams@wsgr.com](mailto:sWilliams@wsgr.com)

Melissa E. Mills (admitted *pro hac vice*)  
Ariel Christen Green Anaba  
(admitted *pro hac vice*)  
WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation  
953 East Third Street, Suite 100  
Los Angeles, California 90013  
Telephone: (323) 210-2900  
Facsimile: (866) 974-7329  
Email: [mmills@wsgr.com](mailto:mmills@wsgr.com)

/s/ Aaron Healey

JONES DAY  
250 Vesey Street  
New York, NY 10281  
Telephone: (212) 326-3939  
[ahealey@jonesday.com](mailto:ahealey@jonesday.com)

John M. Majoras (*pro hac vice*)  
Rosanna K. McCalips (*pro hac vice*)  
Brett J. Wierenga (*pro hac vice*)  
JONES DAY

51 Louisiana Avenue, N.W.  
Washington, D.C. 2001  
Telephone: (202) 879-3939  
[jmmajoras@jonesday.com](mailto:jmmajoras@jonesday.com)  
[rkmccalips@jonesday.com](mailto:rkmccalips@jonesday.com)  
[bwierenga@jonesday.com](mailto:bwierenga@jonesday.com)

Katherine E. Eayre (Pa. 328825)  
JONES DAY  
500 Grant Street, Suite 4500  
Pittsburgh, PA 15219  
Telephone: (412) 391-3939  
[keayre@jonesday.com](mailto:keayre@jonesday.com)

*Counsel for Defendants*  
Sanofi-Aventis U.S. LLC, Sanofi-Aventis Puerto Rico Inc., Sanofi S.A., and Aventis Pharma S.A.

Email: [aanaba@wsgr.com](mailto:aanaba@wsgr.com)

John A. Schwab (PA Bar No. 89596)  
JOHN A. SCHWAB ATTORNEY AT LAW, LLC  
300 Koppers Building  
436 Seventh Avenue, Suite 300  
Pittsburgh, Pennsylvania 15219  
Telephone: (412) 235-9150  
Email: [jas@johnschwablaw.com](mailto:jas@johnschwablaw.com)

*Counsel for Plaintiffs Mylan Pharmaceuticals Inc.,  
Mylan Specialty L.P., and Mylan Inc.*