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April 26, 2024

VIA ECF

Hon. Michael A. Hammer, U.S.M.J.
 United States District Court for the District of New Jersey
 Martin Luther King Jr. Bldg. & U.S. Courthouse
 50 Walnut Street
 Newark, New Jersey 07102

Re: *Teva Branded Pharmaceutical Products R&D, Inc., et al. v. Amneal Pharmaceuticals of New York, LLC, et al.*
Civil Action No. 2:23-cv-20964 (SRC-MAH)

Dear Judge Hammer:

This firm, together with Goodwin Procter LLP, represents Plaintiffs Teva Branded Pharmaceutical Products R&D, Inc., Norton (Waterford) Ltd., and Teva Pharmaceuticals USA, Inc. (collectively, “Teva”) in connection with the above-referenced matter.

We write jointly on behalf of the parties with the following two requests:

1. Requesting a modification to the Amended Pretrial Scheduling Order (D.E. 56); and
2. Requesting an extension of the deadline for Defendants (collectively, “Amneal”) to file Amneal’s reply brief to Amneal’s Motion for Judgment on the Pleadings (D.E. 58).

First, pursuant to the requested modification to the Amended Pretrial Scheduling Order (D.E. 56), the deadlines for Teva to serve its Infringement Contentions, Responses to Amneal’s Invalidity Contentions, and accompanying document productions would be extended from May 7, 2024 to May 22, 2024. With this extension, the parties request adjustments to initial claim construction exchanges, as provided in the table below:

Event	Current Date (D.E. 56)	Proposed Date
Plaintiffs Shall Disclose its Asserted Claims and Infringement Contentions and Accompanying Documents Pursuant to L. Pat. R. 3.6(g)–(h)	5/7/24	5/22/24

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Event	Current Date (D.E. 56)	Proposed Date
Plaintiffs Shall Serve Responses to Invalidity Contentions and Accompanying Documents Pursuant to L. Pat. R. 3.6(i)	5/7/24	5/22/24
Parties Will Exchange the Proposed Terms Necessary for Claim Construction under L. Pat. R. 4.1(a)	5/21/24	6/5/24
Parties Will Exchange Their Preliminary Claim Constructions and Identify any Intrinsic and Extrinsic Evidence, Pursuant to L. Pat. R. 4.2(a)–(b)	6/10/24	6/21/24
Parties Will Exchange Identifications of all Intrinsic and Extrinsic Evidence They Intend to Rely Upon in Opposing any Proposed Claim Construction and Thereafter Meet and Confer to Narrow Issues Pursuant to L. Pat. R. 4.2(c)–(d)	6/24/24	6/28/24

Second, the parties request that the deadline for Amneal to file its reply brief to Amneal's motion (D.E. 58) be extended from April 30, 2024 to May 7, 2024.

Should the Court find the above requests acceptable, the parties request that Your Honor "So Order" this letter. As always, we thank the Court for its attention to this matter and are available should Your Honor or Your Honor's staff have any questions.

Respectfully submitted,

s/ Liza M. Walsh

Liza M. Walsh

cc: All Counsel of Record (via ECF and Email)

SO ORDERED:

Hon. Michael A. Hammer, U.S.M.J