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May 27, 2025

VIA EMAIL

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Counsel for Defendants Padagis LLC, Padagis US LLC, and Padagis Israel Pharmaceuticals Ltd.

Re: ***Neurelis, Inc., v. Padagis LLC, Padagis US LLC, and Padagis Israel Pharmaceuticals LTD, 1:24-cv-00562-MN (D.Del.), Padagis's Subpoena, filed May 13, 2025***

Counsel:

On behalf of third-party Mr. David Hale, we write regarding Padagis's subpoena that was served May 13, 2025 ("Subpoena") and for which were authorized to accept service. Padagis's Subpoena requests that Mr. Hale testify at a deposition in the above-captioned action and Padagis requested the production of certain documents and things ("Requests"). Pursuant to Rule 45(d) of the Fed. R. Civ. P., the following constitutes Mr. Hale's responses and objections thereto.

First, the Subpoena sets forth the date of the deposition as June 18, 2025. Mr. Hale objects to this date for the deposition but is willing – through counsel – to find a mutually acceptable date to conduct a video deposition in accordance with the limitations set forth in the August 28, 2024 Scheduling Order entered in this action and the agreements reached between counsel.

Second, Mr. Hale objects to these Requests to the extent they:

- Are overbroad, unduly burdensome, and not proportional to the needs of this case, especially in view of the fact that Mr. Hale is a third-party to this action;
- Seek disclosure of information that is protected by the attorney-client privilege, the attorney work product doctrine, joint defense, common interest and/or any other applicable privilege;
- Call for information not within the possession, custody or control of Mr. Hale;
- Seek information already in Padagis's possession or that is equally available to Padagis from public sources;

- Contain terms or phrases that are vague, ambiguous, and unintelligible;
- Seek information that is not relevant to any party's claim or defense;
- Are cumulative and duplicative of other forms of discovery that are more convenient and less burdensome on this third-party;
- Prematurely call for expert analysis, testimony, opinions or documents;
- Seek confidential information of third parties that Mr. Hale is under no duty or obligation to disclose;
- Seek a legal conclusion.

Third**,** notwithstanding the foregoing objections, and subject thereto, Mr. Hale has searched for and provided to counsel for production potentially relevant non-privileged/non-work product responsive documents in hard-copy and electronic form. I understand that such documents have already been produced.

Sincerely,



Connor S. Romm

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Re: ***Neurelis, Inc., v. Padagis LLC, Padagis US LLC, and Padagis Israel Pharmaceuticals LTD, 1:24-cv-00562-MN (D.Del.), Padagis's Subpoena, filed May 13, 2025***

Counsel:

On behalf of third-party Dr. Mark Mitchnick, we write regarding Padagis's subpoena that was served May 13, 2025 ("Subpoena") and for which were authorized to accept service. Padagis's Subpoena requests that Dr. Mitchnick testify at a deposition in the above-captioned action and Padagis requested the production of certain documents and things ("Requests"). Pursuant to Rule 45(d) of the Fed. R. Civ. P., the following constitutes Dr. Mitchnick's responses and objections thereto.

First, the Subpoena sets forth the date of the deposition as June 17, 2025. Dr. Mitchnick objects to this date for the deposition but is willing – through counsel – to find a mutually acceptable date to conduct a video deposition in accordance with the limitations set forth in the August 28, 2024 Scheduling Order entered in this action and the agreements reached between counsel.

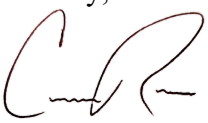
Second, Dr. Mitchnick objects to these Requests to the extent they:

- Are overbroad, unduly burdensome, and not proportional to the needs of this case, especially in view of the fact that Dr. Mitchnick is a third-party to this action;
- Seek disclosure of information that is protected by the attorney-client privilege, the attorney work product doctrine, joint defense, common interest and/or any other applicable privilege;
- Call for information not within the possession, custody or control of Dr. Mitchnick;
- Seek information already in Padagis's possession or that is equally available to Padagis from public sources;

- Contain terms or phrases that are vague, ambiguous, and unintelligible;
- Seek information that is not relevant to any party's claim or defense;
- Are cumulative and duplicative of other forms of discovery that are more convenient and less burdensome on this third-party;
- Prematurely call for expert analysis, testimony, opinions or documents;
- Seek confidential information of third parties that Dr. Mitchnick is under no duty or obligation to disclose;
- Seek a legal conclusion.

Third**,** notwithstanding the foregoing objections, and subject thereto, Dr. Mitchnick has searched for potentially relevant non-privileged/non-work product responsive documents in hard-copy and electronic formats but found none.

Sincerely,



Connor S. Romm

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Re: ***Neurelis, Inc., v. Padagis LLC, Padagis US LLC, and Padagis Israel Pharmaceuticals LTD, 1:24-cv-00562-MN (D.Del.), Padagis's Subpoena, filed May 13, 2025***

Counsel:

On behalf of third-party Mr. Steve Cartt, we write regarding Padagis's subpoena that was served May 13, 2025 ("Subpoena") and for which were authorized to accept service. Padagis's Subpoena requests that Mr. Cartt testify at a deposition in the above-captioned action and Padagis requested the production of certain documents and things ("Requests"). Pursuant to Rule 45(d) of the Fed. R. Civ. P., the following constitutes Mr. Cartt's responses and objections thereto.

First, the Subpoena sets forth the date of the deposition as June 3, 2025. Mr. Cartt objects to this date for the deposition but is willing – through counsel – to find a mutually acceptable date to conduct a video deposition in accordance with the limitations set forth in the August 28, 2024 Scheduling Order entered in this action and the agreements reached between counsel.

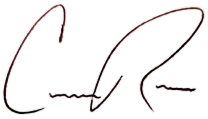
Second, Mr. Cartt objects to these Requests to the extent they:

- Are overbroad, unduly burdensome, and not proportional to the needs of this case, especially in view of the fact that Mr. Cartt is a third-party to this action;
- Seek disclosure of information that is protected by the attorney-client privilege, the attorney work product doctrine, joint defense, common interest and/or any other applicable privilege;
- Call for information not within the possession, custody or control of Mr. Cartt;
- Seek information already in Padagis's possession or that is equally available to Padagis from public sources;

- Contain terms or phrases that are vague, ambiguous, and unintelligible;
- Seek information that is not relevant to any party's claim or defense;
- Are cumulative and duplicative of other forms of discovery that are more convenient and less burdensome on this third-party;
- Prematurely call for expert analysis, testimony, opinions or documents;
- Seek confidential information of third parties that Mr. Cartt is under no duty or obligation to disclose;
- Seek a legal conclusion.

Third**,** notwithstanding the foregoing objections, and subject thereto, Mr. Cartt has searched for and provided to counsel for production potentially relevant non-privileged/non-work product responsive documents in hard-copy and electronic form. I understand that such documents have already been produced.

Sincerely,



Connor S. Romm

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