

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

NIVAGEN, INC.,

Plaintiff

v.

SUN PHARMACEUTICALS INDUSTRIES,  
INC.,

Defendant.

Case No.: 2:24-cv-36-RWS-RSP

**JURY TRIAL DEMANDED**

**DEFENDANT SUN PHARMACEUTICAL INDUSTRIES, INC.’S FOURTH SET OF  
REQUESTS FOR PRODUCTION TO PLAINTIFF NIVAGEN, INC. (NOS. 39-42)**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendant Sun Pharmaceutical Industries, Inc. (“Sun”) requests that Plaintiff Nivagen, Inc. (“Nivagen”), produce the documents and things requested herein within thirty (30) days from the date of service of these Requests by sending them to the offices of Carlson, Caspers, Vandenburg & Lindquist, P.A., 225 South Sixth Street, Suite 4200, Minneapolis, MN 55402, or such other place and in such manner as may be mutually agreed upon between counsel for the parties.

**DEFINITIONS AND INSTRUCTIONS**

Sun hereby incorporates by reference the Definitions and Instructions found in Sun’s First Set of Interrogatories to Plaintiff and First Set of Document Requests, as if fully set forth herein.

## **REQUESTS**

### **REQUEST FOR PRODUCTION NO. 39:**

All documents and things in the possession, custody, or control of Vishal S. Narang concerning phenobarbital, Sun's product, or Sun Pharma Advanced Research Company Ltd. ("SPARC"), including, but not limited to, communications, analyses, evaluations, reports, meeting minutes, memoranda, and correspondence with third parties.

### **REQUEST FOR PRODUCTION NO. 40:**

All documents and things relating to negotiations between Plaintiff and Hikma concerning phenobarbital, including, but not limited to, communications with William Larkins, analyses, evaluations, financial projections, reports, meeting minutes, and memoranda.

### **REQUEST FOR PRODUCTION NO. 41:**

All documents and communications between Plaintiff and JSS Medical Research concerning phenobarbital, including, but not limited to, all communications with Renu Razdan.

### **REQUEST FOR PRODUCTION NO. 42:**

All documents and things involving Nobelpharma, Nobelbar<sup>®</sup>, and phenobarbital including, but not limited to, communications, negotiations, analyses, evaluations, comparisons, memoranda, and correspondence with third parties including Sumitomo Corporation of Americas and Nobelpharma.

Date: April 29, 2025

s/ Justin T. Oakland

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 29, 2025, a true and correct copy of the foregoing document was served upon Nivagen via electronic mail.

By: s/ Justin T. Oakland