

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

BRECKENRIDGE PHARMACEUTICAL, INC.

Plaintiff,

v.

HETERO USA, INC., HETERO LABS
LIMITED UNIT-III, HETERO LABS LIMITED,
and CAMBER PHARMACEUTICALS, INC.,

Defendants.

C.A. No. 1:24-cv-00571-GBW

DEFENDANTS' INITIAL INVALIDITY CONTENTIONS

Pursuant to the Court's Scheduling Order (D.I. 31) and Paragraph 4(d) of the Default Standard for Discovery, Defendants Hetero USA, Inc., Hetero Labs Limited Unit-III, Hetero Labs Limited, and Camber Pharmaceuticals, Inc. (collectively "Defendants") provide their initial invalidity contentions ("Invalidity Contentions") and produce documents herewith related to their Invalidity Contentions.

Plaintiff Breckenridge Pharmaceutical, Inc. ("Plaintiff" or "Breckenridge") assert claims 1–7 and 10–18 of U.S. Patent No. 11,013,729 ("the '729 patent") and claims 1–20 of U.S. Patent No. 11,752,142 ("the '142 patent") (collectively, "the Asserted Claims") against Defendants, pursuant to Plaintiff's Initial Infringement Contentions and Claim Charts served on November 15, 2024.

While Plaintiffs identified the Asserted Claims in their Contentions, Plaintiff has not amended its Complaint to limit the claims asserted in this case. Indeed, Plaintiff's Contentions say that their identification of asserted claims is an "initial" identification. Defendants reserve the

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Defendants.

Civil Action No. 24-571 (GBW)

NOTICE OF SERVICE

The undersigned hereby certifies that copies of the following document:

DEFENDANTS' INITIAL INVALIDITY CONTENTIONS

were served upon the attorneys listed below via email on this 16th day of December, 2024 prior
to 5:00 P.M. Eastern:

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Dated: December 16, 2024

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