

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

|                                       |   |                            |
|---------------------------------------|---|----------------------------|
| BRECKENRIDGE PHARMACEUTICAL,<br>INC., | ) |                            |
|                                       | ) | C.A. No. 24-571-GBW        |
|                                       | ) |                            |
| Plaintiff,                            | ) |                            |
|                                       | ) |                            |
| v.                                    | ) | <b>JURY TRIAL DEMANDED</b> |
|                                       | ) |                            |
| HETERO USA, INC., HETERO LABS         | ) |                            |
| LIMITED UNIT-III, HETERO LABS         | ) |                            |
| LIMITED, and CAMBER                   | ) |                            |
| PHARMACEUTICALS, INC.,                | ) |                            |
|                                       | ) |                            |
| Defendants.                           | ) |                            |

**PLAINTIFF BRECKENRIDGE PHARMACEUTICAL, INC.’S  
FIRST SET OF INTERROGATORIES (NOS. 1-7)**

Pursuant to Federal Rules of Civil Procedure 26 and 33, Plaintiff Breckenridge Pharmaceutical, Inc. hereby request that Defendants Hetero USA, Inc., Hetero Labs Limited Unit-III, Hetero Labs Limited, and Camber Pharmaceuticals, Inc. (as used herein, collectively referred to as “Hetero” “You” or “Your”) answer the following interrogatories.

These Interrogatories are continuing in nature, and any additional responsive information, documents, or things that may be discovered after the initial responsive production should be produced and these interrogatories should be supplemented within a reasonable time following such discovery pursuant to Federal Rule of Civil Procedure 26.

**INTERROGATORIES**

**INTERROGATORY NO 1:** Describe in detail the factual and legal bases and supporting evidence of which you were aware on July 19, 2024 to support your first counterclaim asserting that you do not infringe, induce the infringement of, or contribute to the infringement of claims 1, 8, 11, and 16 of U.S. Patent No. 11,013,729.

**CERTIFICATE OF SERVICE**

I hereby certify that on August 9, 2024, true and correct copies of the foregoing document were caused to be served on the following counsel of record as indicated:

**BY ELECTRONIC MAIL**

Kenneth L. Dorsney  
Cortlan S. Hitch  
Morris James LLP  
500 Delaware Ave., Ste. 1500  
Wilmington, DE 19801

**BY ELECTRONIC MAIL**

Dennies Varughese  
Adam C. LaRock  
Alexander V. Alfano  
Ryan N. Kaiser  
Christopher Coleman  
Sterne, Kessler, Goldstein & Fox, P.L.L.C.  
1101 K Street, N.W.  
10th Floor  
Washington, D.C. 20005

/s/ Sara M. Metzler

Sara M. Metzler (#6509)  
metzler@rlf.com

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

|                                                                                                                |   |  |
|----------------------------------------------------------------------------------------------------------------|---|--|
| BRECKENRIDGE PHARMACEUTICAL,<br>INC.                                                                           | ) |  |
|                                                                                                                | ) |  |
|                                                                                                                | ) |  |
| Plaintiff,                                                                                                     | ) |  |
|                                                                                                                | ) |  |
| v.                                                                                                             | ) |  |
|                                                                                                                | ) |  |
| HETERO USA, INC., HETERO LABS<br>LIMITED UNIT-III, HETERO LABS<br>LIMITED, and CAMBER<br>PHARMACEUTICALS, INC. | ) |  |
|                                                                                                                | ) |  |
|                                                                                                                | ) |  |
| Defendants.                                                                                                    | ) |  |

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

**PLAINTIFF BRECKENRIDGE PHARMACEUTICAL, INC.’S  
SECOND SET OF INTERROGATORIES (NOS. 8-20)**

Pursuant to Federal Rules of Civil Procedure 26 and 33, Plaintiff Breckenridge Pharmaceutical, Inc. hereby request that Defendants Hetero USA, Inc., Hetero Labs Limited Unit-III, Hetero Labs Limited, and Camber Pharmaceuticals, Inc. (as used herein, collectively referred to as “Hetero” “You” or “Your”) answer the following interrogatories.

These Interrogatories are continuing in nature, and any additional responsive information, documents, or things that may be discovered after the initial responsive production should be produced and these interrogatories should be supplemented within a reasonable time following such discovery pursuant to Federal Rule of Civil Procedure 26.

**DEFINITIONS**

1. “Your Dabigatran Products” or “Your ANDA Products” shall mean the products identified in paragraph 3 of the Complaint (Dkt. 1), in addition to any other product sold by You

**CERTIFICATE OF SERVICE**

I hereby certify that on October 18, 2024, true and correct copies of the foregoing document were caused to be served on the following counsel of record as indicated:

**BY ELECTRONIC MAIL**

Kenneth L. Dorsney  
Cortlan S. Hitch  
Morris James LLP  
500 Delaware Ave., Ste. 1500  
Wilmington, DE 19801

**BY ELECTRONIC MAIL**

Dennies Varughese  
Adam C. LaRock  
Alexander V. Alfano  
Ryan N. Kaiser  
Christopher Coleman  
Christopher M. Gallo  
Sterne, Kessler, Goldstein & Fox, P.L.L.C.  
1101 K Street, N.W.  
10th Floor  
Washington, D.C. 20005

/s/ Kelly E. Farnan

Kelly E. Farnan (#4395)  
farnan@rlf.com

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

|                                       |   |                     |
|---------------------------------------|---|---------------------|
| BRECKENRIDGE PHARMACEUTICAL,<br>INC., | ) |                     |
|                                       | ) | C.A. No. 24-571-GBW |
|                                       | ) |                     |
| Plaintiff,                            | ) |                     |
|                                       | ) |                     |
| v.                                    | ) |                     |
|                                       | ) |                     |
| HETERO USA, INC., HETERO LABS         | ) |                     |
| LIMITED UNIT-III, HETERO LABS         | ) |                     |
| LIMITED, and CAMBER                   | ) |                     |
| PHARMACEUTICALS, INC.,                | ) |                     |
|                                       | ) |                     |
| Defendants.                           | ) |                     |

**PLAINTIFF BRECKENRIDGE PHARMACEUTICAL, INC.’S  
THIRD SET OF INTERROGATORIES (NOS. 21-24)**

Pursuant to Federal Rules of Civil Procedure 26 and 33, Plaintiff Breckenridge Pharmaceutical, Inc. hereby request that Defendants Hetero USA, Inc., Hetero Labs Limited Unit-III, Hetero Labs Limited, and Camber Pharmaceuticals, Inc. (as used herein, collectively referred to as “Hetero” “You” or “Your”) answer the following interrogatories.

These Interrogatories are continuing in nature, and any additional responsive information, documents, or things that may be discovered after the initial responsive production should be produced and these interrogatories should be supplemented within a reasonable time following such discovery pursuant to Federal Rule of Civil Procedure 26.

**DEFINITIONS**

1. The definitions in Breckenridge’s Second Set of Interrogatories are incorporated.

**CERTIFICATE OF SERVICE**

I hereby certify that on April 22, 2025, true and correct copies of the foregoing document were caused to be served on the following counsel of record as indicated:

**BY ELECTRONIC MAIL**

Kenneth L. Dorsney  
Cortlan S. Hitch  
Morris James LLP  
500 Delaware Avenue  
Suite 1500  
Wilmington, DE 19801

**BY ELECTRONIC MAIL**

Dennies Varughese  
Adam C. LaRock  
Christopher M. Gallo  
Alexander V. Alfano  
Christopher Coleman  
Ryan N. Kaiser  
Sterne, Kessler, Goldstein & Fox, P.L.L.C.  
1101 K Street, N.W.  
10th Floor  
Washington, D.C. 20005

/s/ Sara M. Metzler

Sara M. Metzler (#6509)  
metzler@rlf.com

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

|                                    |   |                            |
|------------------------------------|---|----------------------------|
| BRECKENRIDGE PHARMACEUTICAL, INC., | ) |                            |
|                                    | ) | C.A. No. 1:24-cv-00571-GBW |
|                                    | ) |                            |
| Plaintiff,                         | ) |                            |
|                                    | ) |                            |
| v.                                 | ) |                            |
|                                    | ) |                            |
| HETERO USA, INC., HETERO LABS      | ) |                            |
| LIMITED UNIT-III, HETERO LABS      | ) |                            |
| LIMITED, and CAMBER                | ) |                            |
| PHARMACEUTICALS, INC.,             | ) |                            |
|                                    | ) |                            |
| Defendants.                        | ) |                            |

**PLAINTIFF BRECKENRIDGE PHARMACEUTICAL, INC.’S  
FOURTH SET OF INTERROGATORIES (NO. 25)**

Pursuant to Federal Rules of Civil Procedure 26 and 33, Plaintiff Breckenridge Pharmaceutical, Inc. hereby request that Defendants Hetero USA, Inc., Hetero Labs Limited Unit-III, Hetero Labs Limited, and Camber Pharmaceuticals, Inc. (as used herein, collectively referred to as “Hetero” “You” or “Your”) answer the following interrogatory.

**DEFINITIONS**

1. “Your Dabigatran Products” or “Your ANDA Products” shall mean the products identified in paragraph 3 of the Complaint (Dkt. 1), in addition to any other product sold by You in the United States under authority of ANDA No. 207961, including the 110 mg dabigatran product for which Hetero received approval to market on or about August 3, 2024.

2. “Your ANDA” shall refer to ANDA No. 207961.

**INTERROGATORIES**

**INTERROGATORY NO. 25:** Describe in detail Your analysis and decision not to commence commercial marketing of Your Dabigatran Etexilate Capsules (75 mg and 150 mg) in

**CERTIFICATE OF SERVICE**

I hereby certify that on June 6, 2025, true and correct copies of the foregoing document were caused to be served on the following counsel of record as indicated:

**BY ELECTRONIC MAIL**

Kenneth L. Dorsney  
Cortlan S. Hitch  
Morris James LLP  
500 Delaware Avenue  
Suite 1500  
Wilmington, DE 19801

**BY ELECTRONIC MAIL**

Dennies Varughese  
Adam C. LaRock  
Christopher M. Gallo  
Alexander V. Alfano  
Christopher Coleman  
Ryan N. Kaiser  
Sterne, Kessler, Goldstein & Fox, P.L.L.C.  
1101 K Street, N.W.  
10th Floor  
Washington, D.C. 20005

/s/ Sara M. Metzler

Sara M. Metzler (#6509)  
metzler@rlf.com