

**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

**HETERO’S RESPONSES AND OBJECTIONS TO PLAINTIFF’S FOURTH SET OF
REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS (NOS. 82-90)**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the District of Delaware, Defendants Hetero USA, Inc., Hetero Labs Limited Unit-III, Hetero Labs Limited, and Camber Pharmaceuticals, Inc. (collectively, “Hetero”), by and through undersigned counsel, object and respond to Plaintiff Breckenridge Pharmaceutical, Inc.’s (“Plaintiff”) Fourth Set of Requests for Production of Documents and Things (Nos. 82-90) as follows.

GENERAL OBJECTIONS

Hetero incorporates by reference its General Objections set forth in Hetero’s Responses and Objections to Plaintiffs’ First Set of Requests for Production of Documents and Things (Nos. 1-12), served September, 9, 2024; Hetero’s Responses and Objections to Plaintiff’s First Set of Interrogatories (Nos. 1-7), served September 9, 2024; Hetero’s Responses and Objections to Plaintiff’s Second Set of Requests for Production of Documents and Things (Nos. 13-65), served

[REDACTED]

REQUEST NO. 90:

All communications between any agent of the Defendants and any agent of MSN that pertain to the petition for inter partes review filed by MSN with the USPTO on June 6, 2025 (IPR2025-01107), including but not limited to communications that refer or relate in any way to any effort to coordinate or cooperate in any way with the preparation and filing of said petition.

RESPONSE AND OBJECTIONS TO REQUEST NO. 90:

Hetero incorporates its General Objections as though set forth fully herein. In addition to the foregoing General Objections, Hetero specifically objects to this Request to the extent it seeks information or documents protected by the attorney-client privilege, the attorney work product doctrine, the common interest privilege, and/or other applicable privilege. Hetero objects to this Request to the extent that it seeks information deemed confidential by third party non-litigants and/or information that Hetero is obligated to maintain as confidential and/or not to disclose.

Hetero objects to this Request as not relevant to any party's claim or defense. Hetero objects to this Request as not proportional to the needs of the case. Hetero further objects to this Request as overly broad, vague, ambiguous, unduly burdensome, not relevant to any party's claim or defense, and not proportional to the needs of the case in that it seeks "[a]ll communications between any agent of the Defendants and any agent of MSN that pertain to the petition for inter partes review filed by MSN with the USPTO on June 6, 2025 (IPR2025-01107)." Hetero further objects to this Request as overly broad, vague, ambiguous, unduly burdensome, not relevant to any party's claim or defense, and not proportional to the needs of the case in that it seeks "communications that refer or relate in any way to any effort to coordinate or cooperate in any way with the preparation and filing of said petition." Hetero objects to this Request as vague and ambiguous as to the terms "pertain to," "refer or relate in any way," and "any effort to coordinate or cooperate in any way," as the intended meaning of those terms is unclear. Hetero further objects to this Request to the extent it seeks information that is not in Hetero's possession, custody, and control.

Subject to and without waiving the foregoing objections and the General Objections, and to the extent Hetero understands the Request, Hetero will not produce information in response to this Request.

Hetero's investigation into this Request is ongoing, and Hetero specifically reserves the right to correct, amend, supplement, or modify this response to the extent necessary as discovery in this case progresses.

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INC.,

Plaintiff,

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

Defendants.

Civil Action No. 24-571 (GBW)

NOTICE OF SERVICE

The undersigned hereby certifies that copies of the following document:

**HETERO'S RESPONSES AND OBJECTIONS TO PLAINTIFF'S FOURTH SET
OF REQUESTS FOR PRODUCTION (NOS. 82-90)**

were served upon the attorneys listed below via email on this 28th day of July, 2025 prior to 5:00

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Dated: July 28, 2025

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