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January 9, 2020

VIA ELECTRONIC FILING

Honorable Claire C. Cecchi, U.S.D.J.
U.S. District Court for the District of New Jersey
Martin Luther King Jr. Bldg. &
U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

**RE: *Immunex Corporation, et al. v. Samsung Bioepis Co., Ltd.*,
Civil Action No. 19-11755 (CCC/MF)**

Dear Judge Cecchi:

This firm, together with Sidley Austin LLP, represents Plaintiffs, Immunex Corporation and Amgen Manufacturing, Limited (collectively, "Immunex"), in connection with the above-referenced matter. With the consent of Plaintiff Hoffmann-La Roche Inc., we write jointly with Defendant Samsung Bioepis Co., Ltd. to request that this matter be administratively stayed consistent with the Confidential Stipulation filed with the Court on December 23, 2019 and entry of the Consent Injunction on January 9, 2020.

A proposed form of order is attached for Your Honor's consideration.

Should Your Honor have any questions or concerns we are happy to make ourselves available at Your Honor's convenience.

Respectfully submitted,

s/Liza M. Walsh

Liza M. Walsh

Enclosures

cc: Honorable Mark Falk, U.S.C.M.J. (via ECF)
All Counsel of Record (via ECF and email)

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IMMUNEX CORPORATION; AMGEN
MANUFACTURING, LIMITED; and
HOFFMANN-LA ROCHE INC.;

Plaintiffs,

v.

SAMSUNG BIOEPIS CO., LTD.,

Defendant.

Civil Action No. 19-11755 (CCC/MF)

[PROPOSED] ORDER TO STAY

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THIS MATTER having been opened to the Court by the joint application of Plaintiffs Immunex Corporation and Amgen Manufacturing, Limited, and Hoffmann-La Roche Inc., (collectively, “Plaintiffs”) and Defendant Samsung Bioepis Co., Ltd. (“Defendant”), by and through their undersigned counsel, in connection with the parties’ Joint Letter Request for a Stay (the “Stay Request”), the parties’ Confidential Stipulation, and the entry of the Consent Injunction; and the Court having considered the Parties’ Stay Request; and for good cause having been shown, the Court:

HEREBY ORDERS on this the _____ day of January 2020, that this matter is administratively stayed; and it is

FURTHER ORDERED that the administrative stay remain in place consistent with paragraph 2 of the Confidential Stipulation previously entered by the Court as D.E. 110 (the “Confidential Stipulation”), except that the following shall not be subject to the stay: (1) discovery as set out in Paragraph 6 of the Confidential Stipulation; (2) preliminary injunction proceedings,

including discovery and discovery disputes related thereto; and (3) amendment(s) to the First Amended Complaint.

HONORABLE CLAIRE C. CECCHI
UNITED STATES DISTRICT JUDGE