

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

GENZYME CORPORATION and	)	
AVENTIS INC.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	C.A. No. 21-1736-RGA
NOVARTIS GENE THERAPIES, INC.	)	
and NOVARTIS PHARMACEUTICALS	)	
CORPORATION,	)	
	)	
Defendants.	)	

JOINT STIPULATION AND ORDER OF DISMISSAL WITH PREJUDICE

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs Genzyme Corporation and Aventis Inc. (“Genzyme” or “Plaintiffs”) and Defendants Novartis Gene Therapies, Inc. and Novartis Pharmaceuticals Corporation (“Novartis” or “Defendants”) hereby stipulate and agree that all claims asserted by any party in this action are dismissed with prejudice, and that each party will bear its own fees and costs.

Through this stipulation, the parties also hereby withdraw all pending motions, applications, and other filings and notify the Court that they no longer seek the relief sought by any pending motions, applications, or filings.

All rights of appeal are waived.

Dated: February 14, 2024

WILKS LAW, LLC

/s/ D. Charles Vavala

David E. Wilks (Del. Bar #2793)
Scott B. Czerwonka (Del. Bar #4844)
D. Charles Vavala (Del. Bar #6098)
4250 Lancaster Pike, Suite 200
Wilmington, DE 19805
(302) 225-0858
dwilks@wilks.law
sczerwonka@wilks.law
cvavala@wilks.law

OF COUNSEL:

Katherine A. Helm
Noah M. Leibowitz
DECHERT LLP
Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036
(212) 698-3500
khelm@dechert.com
noah.leibowitz@dechert.com

Martin J. Black
Sharon K. Gagliardi
DECHERT LLP
Cira Centre
2929 Arch Street
Philadelphia, PA 19104
(215) 994-4000
martin.black@dechert.com
sharon.gagliardi@dechert.com

Jonathan D.J. Loeb
DECHERT LLP
3000 El Camino Real Five Palo Alto Sq.
Suite 650
Palo Alto, CA 94306
(650) 813-4800
jonathan.loeb@dechert.com

MCCARTER & ENGLISH, LLP

/s/ Alexandra M. Joyce

Daniel M. Silver (#4758)
Alexandra M. Joyce (#6423)
Renaissance Centre
405 N. King Street, 8th Floor
Wilmington, Delaware 19801
(302) 984-6300
dsilver@mccarter.com
ajoyce@mccarter.com

OF COUNSEL:

John Livingstone
M. David Weingarten, Ph.D.
Megan Meyers
Shannon Patrick
FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER LLP
271 17th Street, NW, Suite 1400
Atlanta, GA 30363-6209
(404) 653.6449
john.livingstone@finnegan.com
david.weingarten@finnegan.com
megan.meyers@finnegan.com
shannon.patrick@finnegan.com

Amanda Murphy, Ph.D.
FINNEGAN, HENDERSON, FARBOW,
GARRETT & DUNNER LLP
1 London Bridge
London, United Kingdom SE1 9BG
amanda.murphy@finnegan.com

Cora Holt
Christopher W. Weber, Ph.D.
Emily Gabranski
FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER LLP
901 New York Avenue, NW
Washington, DC 20001-4413
(202) 408.4153
cora.holt@finnegan.com
christopher.weber@finnegan.com

Amanda K. Antons
DECHERT LLP
35 W. Wacker Drive,
Suite 3400
Chicago, IL 60601
(312) 646-5800
amanda.antons@dechert.com

*Attorneys for Plaintiffs Genzyme Corporation
and Aventis Inc.*

emily.gabranski@finnegan.com

Marta Garcia Daneshvar
FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER LLP
Two Seaport Lane
Boston, MA 02210-2001
(617) 646.1635
marta.garcia@finnegan.com

*Attorneys for Defendants Novartis Gene Therapies,
Inc. and Novartis Pharmaceuticals Corp.*

SO ORDERED this _____ day of _____, 2024.

United States District Court Judge