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10 **UNITED STATES DISTRICT COURT**

11 **SOUTHERN DISTRICT OF CALIFORNIA**

12 **IN RE INCRETIN-BASED  
13 THERAPIES PRODUCTS  
14 LIABILITY LITIGATION**

15 *As to All Related and Member Cases*

16 Case No. 13-md-2452-AJB (MDD)

17 **MDL 2452**

18 **MEMORANDUM IN SUPPORT  
19 OF BILL OF COSTS SUBMITTED  
20 BY DEFENDANT MERCK SHARP  
21 & DOHME CORP.**

22 Date: January 4, 2016

23 Time: 10:00 a.m.

24 Judge: Hon. Anthony J. Battaglia

1 Pursuant to Fed. R. Civ. P. 54(d) and L.R. 54.1, Merck Sharp & Dohme  
2 Corporation (“Merck”) hereby submits this Memorandum in Support of Bill of  
3 Costs. Merck claims \$87,556.32 in deposition costs incurred in connection with  
4 this action as summarized in Exhibit 1 attached to the declaration of Paul E. Boehm  
5 (the “Boehm declaration”). Invoices supporting each of these costs are attached to  
6 the Boehm declaration as Exhibit 2. Such costs are allowable under Fed. R. Civ. P.  
7 54(d) and L.R. 54.1, are correctly stated, and were necessarily incurred.

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9 Dated: December 14, 2015

Respectfully submitted,

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11 DOUGLAS R. MARVIN  
12 PAUL E. BOEHM  
13 WILLIAMS & CONNOLLY LLP

14 By: s/ Paul E. Boehm  
Paul E. Boehm

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16 *Attorneys for Defendant Merck Sharp*  
17 *& Dohme Corp.*