November 28, 2018

VIA FACSIMILE AND OVERNIGHT DELIVERY

U.S. Nuclear Regulatory Commission
Region III
Division of Nuclear Materials Safety
Attention: Sara Forster, Health Physicist Licensing Reviewer
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

Re: Notice and Request for Prior Written Consent to Deemed Indirect Transfer of Control of Materials License No. **13-32212-01, Held by Endocyte, Inc.**

To Whom It May Concern:

Endocyte, Inc. ("Endocyte"), located at 3000 Kent Avenue, Suite A 1-100, West Lafayette, Indiana 47906, is currently the holder of the following license issued by the U.S. Nuclear Regulatory Commission (the "NRC"):

- License No. 13-32212-01 (the "Materials License")

The purpose of this letter is to notify the NRC and seek written consent for what the NRC may deem to be an indirect transfer of control of the Materials License.

The following is a summary of the proposed transaction and timing considerations:

On October 17, 2018, Endocyte, a Delaware corporation, entered into an Agreement and Plan of Merger (the "Merger Agreement") with Novartis AG, a company organized under the laws of Switzerland ("Novartis"), and Edinburgh Merger Corporation, a Delaware Corporation and a wholly owned subsidiary of Novartis ("Merger Sub"). Subject to the terms and conditions of the Merger Agreement, Merger Sub will be merged with and into Endocyte (the "Merger"), with Endocyte continuing as the surviving corporation and a wholly owned subsidiary of Novartis. The Novartis Group is a multinational group of companies specializing in the research, development, manufacturing, and marketing of a broad range of healthcare products led by innovative pharmaceuticals. Novartis is the Novartis Group's

Swiss holding company and owns, directly or indirectly, all of the Novartis Group's significant operating companies.

The consummation of the Merger is subject to certain closing conditions, including (i) the adoption of the Merger Agreement by the holders of a majority of the outstanding shares of Endocyte's common stock, (ii) the expiration or termination of the applicable waiting periods under the Hart-Scott-Rodino Antitrust Improvements Act of 1976, as amended, and under Section 721 of the Defense Production Act of 1950, as amended, (iii) the receipt of certain other required regulatory approvals, if such approvals are required to consummate the Merger, and (iv) the absence of any legal restraints that have the effect of preventing the consummation of the Merger. Endocyte has scheduled a special meeting of its stockholders to be held on December 20, 2018, at which its stockholders will consider and vote upon the adoption of the Merger Agreement, among other proposals. The parties intend to consummate the Merger as soon as possible after all closing conditions are satisfied (or waived) pursuant to the terms of the Merger Agreement.

In accordance with the regulatory guidance in NUREG-1556, Volume 15, Rev. I, Information Notice 89-25, Rev. 1, and Regulatory Issue Summary 2014-08, Rev. I, Endocyte provides the following information regarding the proposed Merger. This information is provided in accordance with the itemized list of information requested in Appendix E, "Information Needed for Transfer of Control Application," of NUREG-1556, Volume 15, Rev. I. Consistent with the regulatory guidance, if any items are not applicable, Endocyte so indicates.

a. *Describe any planned changes in the organization, including but not limited to, transfer of stocks or assets and mergers, change in members on Board of Directors, etc. Provide the new licensee name, mailing address, and contact information, including phone numbers. Clearly identify when the amendment request is due to a name change only.*

The Merger is described above. In addition, at the effective time of the Merger, the individuals holding positions as directors of Merger Sub immediately prior to such time will become the initial directors of Endocyte (as a wholly owned subsidiary of Novartis). Also at the effective time of the Merger, the individuals holding positions as officers of Endocyte immediately prior to such time will be the initial officers of Endocyte (as a wholly owned subsidiary of Novartis). Endocyte's name, mailing

address, contact information, and phone numbers will remain unchanged after the Merger.

b. *Describe any changes in personnel or duties that relate to the licensed program. Include training and experience for new personnel and any changes in the training program.*

Not applicable. There will be no change to the personnel, duties, or training program that relate to the licensed program as a result of the Merger.

c. *Describe any changes in the location, facilities, equipment, radiation safety program, use, possession, waste management, or other procedures that relate to the licensed program.*

Not applicable. There will be no change in the location, facilities, equipment, radiation safety program, use, possession, waste management, or other procedures that relate to the licensed program as a result of the Merger.

d. *Describe the status of the licensee's facilities, equipment, and radiation safety program, including any known contamination and whether decontamination will occur prior to transfer. Include the status of calibrations. Leak tests, area surveys, wipe tests, training quality control, and related records.*

Endocyte's facilities, equipment and radiation safety program are in good operational status with no known contamination. As a result, no decontamination will occur prior to the Merger. Calibrations on the equipment are up to date and current. All area surveys, wipe tests, training, quality control, and other related records are on file.

e. *If current decommissioning funding plans (DFP) will be changed as a result of the transfer, the revised DFP should be submitted. If other financial assurance documents will be changed as a result of the transfer, confirm that all financial assurance instruments associated with the license will be held in the transferee's name before the license* is *transferred, and as required by J O CFR 30.35(j), the licensee must, within 30 days, submit financial instruments reflecting such changes.*

Not applicable. Endocyte's license does not require a decommissioning funding plan because Endocyte holds small quantities and/or short half-life materials.

f. *Confirm that all records concerning the safe and effective decommissioning of the facility will be transferred to the transferee or to NRC. As appropriate. These records include documentation of surveys of ambient radiation levels and fixed and/or removable contamination, including methods and sensitivity.*

Pursuant to 10 CFR 30.35(g), both before and after the Merger, Endocyte shall maintain drawings and records important to the decommissioning of the facility.

g. *Confirm that both transferor and transferee agree to transferring control of the licensed material and activity, and the conditions of transfer, and that the transferee has been made aware of any open inspection items and its responsibility for possible resulting enforcement actions.*

After the Merger, Endocyte (as a wholly owned subsidiary of Novartis) will retain control of licensed material and activity. Endocyte has no open inspection items.

h. *Confirm that the transferee will abide by all constraints, conditions, requirements, representations, and commitments of the transferor or that the transferee will submit a complete description of the proposed licensed program.*

After the Merger, Endocyte (as a wholly owned subsidiary of Novartis) will continue to abide by all current constraints, conditions, requirements, representations, and commitments.

1. *The transferee, in the case of fuel cycle facilities, shall provide documentation showing that it is financially qualified to conduct normal operations. The information can be in the form of income statements and balance sheet forecasts.*

Not applicable. Endocyte does not own or operate a fuel cycle facility.

As the responses above make clear, the Merger involving Endocyte and Novartis is not expected to have any effect on the day-to-day operations of the licensee – Endocyte – with regard to the Materials License. Both before and after the Merger, Endocyte will continue to operate under the conditions, requirements, representations, and commitments identified in the Materials License, including the safety and control procedures.

If you have any questions or need any additional information regarding the Merger and the prior written consent requested in this letter, please contact Jessica Barth of Faegre Baker Daniels LLP at (317) 569-4611. Please address all correspondence and inquiries regarding this request to:

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Respectfully,

Endocyte, Inc.

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Radiation Safety Officer

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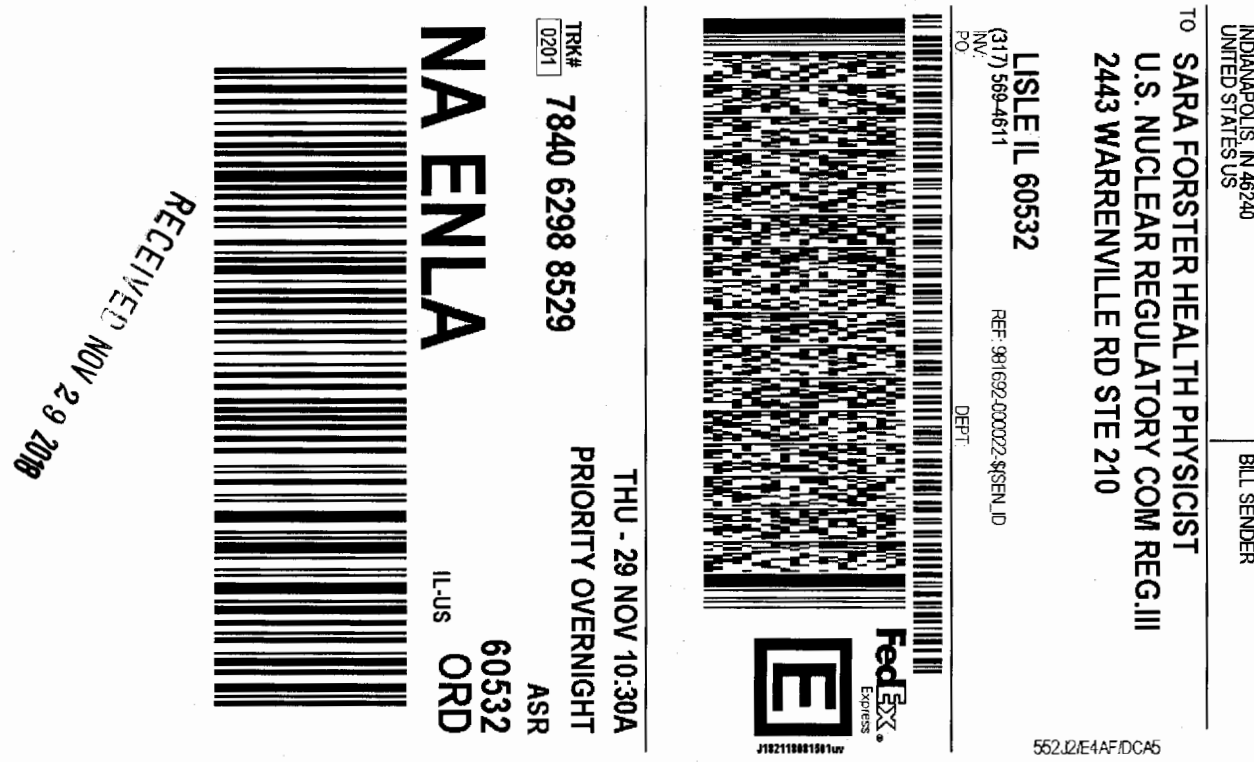
Nov 29th 2018



FOLD on this line and place in shipping pouch with **bar code and delivery address** visible

1. Fold the first printed page in half and use as the shipping label.
2. Place the label in a waybill pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.
3. Keep the second page as a receipt for your records. The receipt contains the terms and conditions of shipping and information useful for tracking your package.