

EXHIBIT 15

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ARBUTUS BIOPHARMA CORPORATION
and GENEVANT SCIENCES GMBH

Plaintiffs,

v.

MODERNA, INC. and MODERNATX,
INC.,

Defendants.

C.A. No. 22-252-MSG

**CONTAINS INFORMATION
MODERNA DESIGNATED HIGHLY
CONFIDENTIAL – OUTSIDE
COUNSEL EYES ONLY**

PLAINTIFFS’ INITIAL INFRINGEMENT CONTENTIONS

Pursuant to the Court’s Scheduling Order (D.I. 72) and Paragraph 4(c) of the Court’s Default Standard for Discovery, Including Discovery of Electronically Stored Information, Plaintiffs Arbutus Biopharma Corporation (“Arbutus”) and Genevant Sciences GmbH (“Genevant”) disclose their initial infringement contentions regarding U.S. Patent Nos. 8,058,069 (“the ’069 patent”); 8,492,359 (“the ’359 patent”); 8,822,668 (“the ’668 patent”); 9,364,435 (“the ’435 patent”); 9,504,651 (“the ’651 patent”); and 11,141,378 (“the ’378 patent”) to Defendants Moderna, Inc. and ModernaTX, Inc. (collectively, “Moderna”).

Plaintiffs’ initial infringement contentions are based on the information currently available to, and known by, Plaintiffs. Fact discovery is ongoing, and Plaintiffs have not yet obtained any deposition testimony from Moderna. The Court has not yet construed any of the asserted claims of the patents-in-suit. The Court has set a schedule pursuant to which the parties will identify terms for construction, provide proposed constructions, cite evidence supportive of those constructions, confer to narrow the disputes before the Court, and then submit, through briefing and oral presentations, their arguments to the Court. The Court will then construe the disputed

their infringement contentions as the pre-trial phase of the litigation proceeds and as additional information comes to light. Plaintiffs specifically reserve the right to supplement these infringement contentions in view of future production of documents, the Court's issuance of a claim construction order, and expert opinions and testimony.

These appended claim charts are provided without prejudice to Plaintiffs' right to introduce expert opinions and demonstratives as expert discovery progresses, and to produce and introduce at trial all evidence, whenever discovered, relating to the proof of currently known and subsequently discovered facts. In addition, the division of each claim into individual limitations below is for convenience only and is without prejudice to Plaintiffs' right to argue for a different division at a later date.

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