

Filed on behalf of: Senju Pharmaceuticals Ltd., Co.

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

METRICS, INC., MAYNE PHARMA, and
JOHNSON MATTHEY, INC.
Petitioner

v.

SENJU PHARMACEUTICAL CO., LTD., BAUSCH & LOMB, INC., and
BAUSCH & LOMB PHARMA HOLDINGS CORP.
Patent Owner

Case IPR2014-01041
Patent 8,129,431 B2

Before FRANCISCO C. PRATS, ERICA A. FRANKLIN, and
GRACE KARAFFA OBERMANN, *Administrative Patent Judges*.

PATENT OWNER'S LIST OF PROPOSED MOTIONS

Pursuant to the Board's Decision (Paper No. 19) instituting an *inter partes* review of U.S. Patent No. 8,129,431, and the Board's Scheduling Order (Paper No. 20) directing the parties to pages 48,765–66 of the Office Patent Trial Practice Guide, 77 Fed. Reg. 48,756 (Section (II)(E)), Patent Owner submits this initial list of proposed motions in advance of the initial conference presently scheduled for March 17, 2015 at 11 a.m. ET:

1. Motion to Seal Confidential Information;
2. Motion to Exclude Evidence;
3. Motion to Amend;
4. Motion to Waive Page Limits Related to a Motion to Amend.

Patent Owner reserves the right to each seek authorization from the Board should the need later arise for filing a motion.

Respectfully submitted,

Date: March 13, 2015

By: /Jonathan R.K. Stroud/
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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing **PATENT OWNER'S LIST OF PROPOSED MOTIONS** was served electronically via e-mail on March 13, 2015, in its entirety on the following, via electronic mail:

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Petitioner has consented to electronic service.

/Ashley F. Cheung/
Ashley Cheung
Case Manager
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