IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

METRICS, INC. Petitioner,

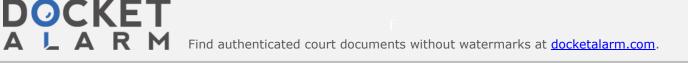
v.

SENJU PHARMACEUTICAL CO., LTD. Patent Owner.

U.S. Patent No. 8,129,431 to Sawa *et al.* Issue Date: March 6, 2012 Title: Aqueous Liquid Preparation Containing 2-Amino-3-(4-bromobenzoyl) Phenylacetic Acid

Inter Partes Review No.: IPR2014-01041

PETITIONER'S LIST OF PROPOSED MOTIONS IN ADVANCE OF INITIAL CONFERENCE CALL



In advance of the Initial Conference Call on March 17, 2015 at 11 a.m. ET, Petitioner Metrics, Inc. ("Metrics") submits the following list of motions that it anticipates filing during this trial. *See* Office Patent Trial Practice Guide, 77 Fed. Reg. 48,756, 48,765–66 (Aug. 14, 2012). This listing is without prejudice to Metrics' right to seek authorization to bring additional motions as circumstances warrant. *Id*.

Motion to file supplemental information pursuant to 37 C.F.R. §
42.123.

2. Motion for additional discovery pursuant to 37 C.F.R. § 42.51(b)(2), regarding Petitioner's Exhibit Nos. EX1008, EX1013, EX1014, EX1032, EX1039, EX1040, EX1048, EX1049 and EX1050.

RESPECTFULLY SUBMITTED,

DUANE MORRIS LLP

Date: March 13, 2015

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CERTIFICATION OF SERVICE ON PATENT OWNER

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on the 13th day

of March 2015, a complete and accurate copy of the foregoing Petitioner's List of

Proposed Motions in Advance of Initial Conference Call was served on Patent

Owner by filing this document via the Patent Review Processing System as well as

delivering a copy via e-mail on the following counsel for Patent Owner at:

M. Andrew Holtman Andy.Holtman@finnegan.com Jonathan R.K. Stroud Jonathan.Stroud@finnegan.com Finnegan, Henderson, Farabow, Garrett & Dunner, LLP 901 New York Avenue, NW Washington, DC 20001-4413

The parties have agreed to electronic service in this proceeding.

Respectfully submitted,

DUANE MORRIS LLP

By: <u>/Patrick D. McPherson /</u> Patrick D. McPherson, Esq. Registration No. 46,255 505 9th Street, Suite 1000 Washington, DC 2004 *Lead Counsel for Petitioner Metrics, Inc.*