

Case No. IPR2015-00643
Case No. IPR2015-00644
Case No. IPR2015-00830

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MYLAN PHARMACEUTICALS, INC.

Petitioner

v.

YEDA RESEARCH AND DEVELOPMENT CO. LTD.

Patent Owner

Case No. IPR2015-00643 (8,232,250 B2)
Case No. IPR2015-00644 (8,399,413 B2)
Case No. IPR2015-00830 (8,969,302 B2)¹

**MOTION FOR *PRO HAC VICE* ADMISSION
OF SHANNON M. BLOODWORTH**

¹ This Declaration of Shannon M. Bloodworth in Support of Motion for *Pro Hac Vice* Admission addresses all above referenced cases. The word-for-word identical paper is filed in each proceeding identified in the caption.

I. Statement of Precise Relief Requested

Mylan Pharmaceuticals Inc. (“Mylan”) hereby respectfully requests that the Patent Trial and Appeal Board (the “Board”) admit Shannon M. Bloodworth *pro hac vice* in this proceeding under 37 C.F.R. § 42.10(c).

Patent Owner has stated it will not oppose this motion.

II. Statement of Facts Showing Good Cause for the Board to Recognize Counsel *Pro Hac Vice* During the Proceeding

Under 37 C.F.R. § 42.10(c), the Board may admit counsel *pro hac vice* for good cause, so long as lead counsel is a registered practitioner and subject to any other conditions the Board requires. Under Section 42.10(c), good cause includes when “counsel is an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding.” This motion satisfies the requirements of Section 42.10(c):

1. Lead counsel, Jeffrey Guise, is a registered practitioner.
2. Ms. Bloodworth is an experienced patent litigator and has an established familiarity with the subject matter at issue here, as shown in her accompanying October 8, 2015 Declaration (“Bloodworth Decl.”), attached hereto. That declaration shows that Ms. Bloodworth has been a litigator for 14 years. She is a member in good standing of the District of Columbia, Maryland, Virginia, Wisconsin, and is also admitted in several federal courts. She is also familiar with the subject matter of this case, including U.S. Patent No. 8,232,250, U.S. Patent

No. 8,399,413 and U.S. Patent No. 8,969,302, the prosecution history for each patent, the underlying technology, and the prior art cited by the petitioner in this matter. Bloodworth Decl. ¶¶ 8-9.

3. In her declaration, Ms. Bloodworth also attests to each of the listed items required by the Order – Authorizing Motion for *Pro Hac Vice* Admission – 37 C.F.R. § 42.10 in IPR2013-00639. See Bloodworth Decl. ¶¶ 2-13.

III. Conclusion

For the foregoing reasons, Mylan respectfully requests that the Board admit Shannon M. Bloodworth *pro hac vice* in this proceeding.

Dated: October 8, 2015

/Brandon M. White/

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**DECLARATION OF SHANNON M. BLOODWORTH
IN SUPPORT OF MOTION FOR *PRO HAC VICE* ADMISSION OF
SHANNON M. BLOODWORTH**

¹ This Declaration of Shannon M. Bloodworth in Support of Motion for *Pro Hac Vice* Admission addresses all above referenced cases. The word-for-word identical paper is filed in each proceeding identified in the caption.

I, Shannon M. Bloodworth, declare as follows:

1. I am a partner in the patent litigation group at Perkins Coie LLP.
2. I am a member in good standing of the Bar of the States of Maryland and Wisconsin, the Commonwealth of Virginia and the District of Columbia. I am also admitted to practice before the United States Courts of Appeals for the Fourth Circuit, D.C. Circuit, Federal Circuit and the United States Supreme Court. I am admitted to practice before the United States District Courts for D.C. and Maryland, and the Supreme Courts of Virginia and Wisconsin.
3. My Bar membership numbers are VA 46671, DC 474925 and WI 1088470.
4. I have been practicing law for almost 15 years, including litigating patent cases, specifically focused on pharmaceutical patent cases, for the last 14 years.
5. More generally, I have represented the Petitioner and/or and its various related entities in litigating significant pharmaceutical patent cases, such as the following infringement cases:
 - *Teva Pharmaceuticals USA Inc., et al. v. Mylan Pharmaceuticals Inc., et al.*, Civil Action No.1:09-cv-08824-WHP (U.S. District Court for the Southern District of New York);

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