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INTELLECTUAL PROPERTY LAW

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February 27, 2015

(Electronically Filed)
Ms. Tina Lee, Trial Paralegal
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P O Box 1450
Alexandria, VA 22313-1450

Re: Case IPR2015-00715

Dear Ms. Lee:

Pursuant to the Notice Of Filing Date Accorded To Petition And Time For Filing Patent Owner Preliminary Response mailed February 26, 2015, the above-identified petition for *inter partes* review was accorded the filing date of February 6, 2015. However, a review of the petition identified a defect in that the claims chart allegedly contains arguments on page 32, second and third paragraphs.

Petitioner appreciates being accorded the February 6, 2015 filing date and both the identification of the defect and an explanation of how it can be addressed. Accordingly, the last two paragraphs in the claim chart on page 32, namely that beginning "There was a motivation" and "The use of a siliconized" have been deleted in their entireties. Other than this deletion, Petitioner has changed the title to reflect a "corrected" petition, changed the caption to match that provided in the Notice, updated the table of contents and table of authorities due to the change in pagination, updated the certificate of service, and amended the header to include the IPR number and corrected title. No other changes have been made to the petition and no new matter was introduced. The corrected petition is also being re-served on the parties identified in the certificate of service.

The notice, mailed February 26, 2015, set a five business day time period for correction of the defect and therefore the filing of this corrected petition should be considered in compliance therewith. Should you or the Board have any further questions in connection with this matter, please do not hesitate to contact lead counsel, William L. Mentlik or me.

Sincerely yours,

LERNER, DAVID, LITTENBERG,
KRUMHOLZ & MENTLIK, LLP

MICHAEL H. TESCHNER
Registration No. 32,862
Counsel for Petitioner

MHT/kat

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served on February 27, 2015, by FedEx on Blanchard & Associates (the Patent Owner's counsel of record), Fresenius Kabi USA, LLC, and Goodwin Procter LLP at the addresses listed below.

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Dated: February 27, 2015

By: s/ Michael H. Teschner
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