

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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INNOPHARMA LICENSING, INC., INNOPHARMA LICENSING LLC,  
INNOPHARMA INC., INNOPHARMA LLC, MYLAN PHARMACEUTICALS  
INC., and MYLAN INC.,  
LUPIN LTD., AND LUPIN PHARMACEUTICALS INC.,  
Petitioner,

v.

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

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Case IPR2015-00903<sup>1</sup>  
U.S. Patent 8,129,431

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**SUBMISSION OF REDLINE PROPOSED STIPULATED  
PROTECTIVE ORDER**

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<sup>1</sup> IPR2015-01871 has been joined with this proceeding.

In accordance with the Board's email of May 25, 2016 the attached Appendix B contains a red-lined version (relative to the Board's default protective order) of the Proposed Stipulated Protective Order, agreed to by the parties and filed by Patent Owner on December 28, 2015.

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# EXHIBIT B

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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INNOPHARMA LICENSING, INC., INNOPHARMA LICENSING LLC,  
INNOPHARMA INC., INNOPHARMA LLC, MYLAN PHARMACEUTICALS  
INC., and MYLAN INC.,  
Petitioner,

v.

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

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Case IPR2015-00902 (Patent 8,669,290 B2)  
Case IPR2015-00903 (Patent 8,129,431 B2)<sup>1</sup>

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**PROPOSED STIPULATED PROTECTIVE ORDER**

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<sup>1</sup> The word-for-word identical paper is filed in each proceeding identified in the heading.

This standing joint protective order governs the treatment and filing of confidential information, including documents and testimony.<sup>2</sup>

1. **Marking of Confidential Information.** Confidential information shall be clearly marked as either “PROTECTIVE ORDER MATERIAL - BOARD’S EYES ONLY” or “PROTECTIVE ORDER MATERIAL - FED R. EVID 615” or “PROTECTIVE ORDER MATERIAL”.

2. **Persons Having Access to Confidential Information Marked “PROTECTIVE ORDER MATERIAL - BOARD’S EYES ONLY”.** For the confidential information marked “PROTECTIVE ORDER MATERIAL - BOARD’S EYES ONLY”, access to confidential information is limited to the Employees and representatives of the Office who have a need for access to the confidential information. Such employees and representatives shall have such access without the requirement to sign an Acknowledgement. Such employees and representatives shall include the Director, members of the Board and their clerical staff, other support personnel, court reporters, and other persons acting on behalf of the Office.

3. **Persons Having Access to Confidential Information Marked “PROTECTIVE ORDER MATERIAL - FED R. EVID 615”.** For the

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<sup>2</sup> Nothing in this Order prevents any Party from challenging a confidentiality designation to any Exhibit by raising the matter with the Board.

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