

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

SENJU PHARMACEUTICAL CO., LTD.,)	
BAUSCH & LOMB INCORPORATED, and)	
BAUSCH & LOMB PHARMA HOLDINGS)	
CORP.,)	
Plaintiffs,)	
v.)	
)	C.A. No.: 1:14-cv-00667-JBS-KMW
LUPIN, LTD. and LUPIN)	C.A. No.: 1:14:cv-04149-JBS-KMW
PHARMACEUTICALS, INC.,)	C.A. No.: 1:14-cv-05144-JBS-KMW
Defendants.)	C.A. No.: 1:15-cv-00335-JBS-KMW
)	C.A. No.: 1:14-cv-06893-JBS-KMW
INNOPHARMA LICENSING, INC.,)	C.A. No.: 1:15-cv-03240-JBS-KMW
INNOPHARMA LICENSING, LLC,)	
INNOPHARMA, INC., INNOPHARMA,)	
LLC,)	
Defendants.)	

**OPENING EXPERT REPORT OF
M. JAYNE LAWRENCE, PH.D.**

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I, Jayne Lawrence, Ph.D., have been asked to render opinions regarding U.S. Patent 8,129,431 (“the ’431 patent”), U.S. Patent 8,669,290 (“the ’290 patent”), U.S. Patent 8,754,131 (“the ’131 patent”), U.S. Patent 8,871,813 (“the ’813 patent”) and U.S. Patent 8,927,606 (“the ’606 patent”) (collectively, “the patents-in-suit”). I hereby submit the following Expert Report on behalf of Defendants Lupin Limited, Lupin Pharmaceuticals, Inc., InnoPharma Licensing, Inc., InnoPharma Licensing, LLC, InnoPharma, Inc., and InnoPharma, LLC.

I. QUALIFICATIONS

1. I am an expert in the field of formulation and drug delivery, specifically pharmaceutical formulation for oral and parenteral use (i.e., non-oral, including intravenous, intramuscular, nasal, respiratory and ophthalmic), including aqueous liquid preparations. I have been an expert in this field since prior to 2003.

2. I received a B.Sc. with first class (top) honors from Liverpool Polytechnic in 1981, and a Ph.D. in Pharmacy from Manchester University in 1985. The subject of my Ph.D. studies was the design, synthesis and physico-chemical characterization of novel non-ionic surfactants for use in aqueous pharmaceutical formulations. I performed my Ph.D. studies under the supervision of Professors P.H. Elworthy and D. Attwood.

3. From 1984 to the present time I have held full-time, tenured academic positions of increasing seniority in Pharmacy (Lecturer 1984-1997, Senior Lecturer 1997-1999), Drug Delivery (Reader 2000-2003) and, most recently Biophysical Pharmaceutics (Professor 2003- to date) at King’s College London. I note that my professorship at King’s College London is the United Kingdom equivalent of a full, tenured Professorship in a university in the United States. In 1993 I spent a 6 month sabbatical working in Respiratory Product Development in

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