

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LUPIN LTD. and LUPIN PHARMACEUTICALS INC.
Petitioners

v.

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

IPR2015-01097 (US Patent No. 8,751,131)
IPR2015-01099 (US Patent No. 8,669,290)
IPR2015-01100 (US Patent No. 8,927,606)
IPR2015-01105 (US Patent No. 8,871,813)¹

**PETITIONER'S NOTICE OF CROSS-EXAMINATION OF
SHIROU SAWA**

¹ The word-for-word identical paper is filed in each proceeding identified in the heading. IPR2016-00089 has been joined with IPR2015-01097; IPR2016-00091 has been joined with IPR2015-01100; and IPR2016-00090 has been joined with IPR2015-01105. Each of these joined proceedings includes Petitioners InnoPharma Licensing, Inc., InnoPharma Licensing LLC, InnoPharma Inc., Mylan Pharmaceuticals Inc., and Mylan Inc. (collectively, "InnoPharma") in addition to the parties identified above.

Pursuant to 37 C.F.R. § 42.53, Lupin Ltd. and Lupin Pharmaceuticals Inc. (collectively, “Petitioners”), by and through its attorneys, will conduct a cross-examination by deposition of Shirou Sawa in connection with IPR2015-01097, IPR2015-01099, IPR2015-01100, and IPR2015-01105. Mr. Sawa’s cross-examination will take place, as agreed by counsel for the parties, on March 18, 2016, commencing at 9:00 a.m. (local time), at the offices of Finnegan, Henderson, Farabow, Garrett & Dunner, LLP, 901 New York Avenue, NW, Washington, DC 20001-4413. Counsel for Patent Owner has represented that Mr. Sawa is willing to appear at the time and location indicated above.

The cross-examination will take place before a Notary Public or other officer authorized by law to administer oaths. It will be recorded using at least audiotape and/or stenographic means. Petitioners also intend to video record the cross-examination of Mr. Sawa. The arrangements for the reporter and videographer will be made by counsel for Petitioners. Counsel for Patent Owner has notified Petitioners that Mr. Sawa will require an interpreter, thus Petitioner will initiate a conference with the Board pursuant to 37 C.F.R. § 42.53(e) in due course.

Respectfully submitted,

March 9, 2016

/Deborah Yellin/
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CERTIFICATION OF SERVICE

The undersigned hereby certifies that the foregoing document entitled
PETITIONER'S NOTICE OF CROSS-EXAMINATION OF SHIROU SAWA
was served electronically via email on March 8, 2016 to Patent Owner's counsel of
record and counsel of record for Petitioners InnoPharma at the following:

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