

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

Petitioner

v.

SENJU PHARMACEUTICAL CO., LTD.,

Patent Owner

Case IPR2015-01097 (Patent 8,754,131 B2)¹

Case IPR2015-01100 (Patent 8,927,606 B1)²

Case IPR2015-01105 (Patent 8,871,813 B2)^{3,4}

SECOND RENEWED MOTION TO SEAL

¹ Case IPR2016-00089 has been joined with this proceeding.

² Case IPR2016-00091 has been joined with this proceeding.

³ Case IPR2016-00090 has been joined with this proceeding.

⁴ A word-for-word identical paper has been filed in each proceeding identified in the heading.

IPR2015-01097 (Patent 8,754,131 B2)
IPR2015-01100 (Patent 8,927,606 B1)
IPR2015-01105 (Patent 8,871,813 B2)

I. Introduction

Through this Second Renewed Motion to Seal, Patent Owner requests that certain confidential information belonging to Patent Owner and third party BioScience found in certain Petitioner's exhibits be sealed. To the best of Patent Owner's knowledge, the Patent Owner certifies that the information identified as confidential in this motion has not been published or otherwise made public.

Petitioner Lupin does not oppose sealing this information.

The Board has denied Petitioner's requests to seal certain Patent Owner confidential information found in certain Petitioner's exhibits. (IPR2015-Paper 59. On July 18, 2016, the parties filed a modified Stipulated Protective Order. Paper 64. On July 29, 2016, Patent Owner filed a Renewed Motion to Seal requesting, among other things, that certain Patent Owner confidential information, related to Patent Owner's New Drug Application ("NDA") (Exs. 2096, 2102, 2103, 2110, 2251, 2291-2293) and certain third-party confidential information, belonging to BioScience (Exs. 2267-2278, 2294), be sealed and explaining there was good cause for sealing this confidential information under 37 C.F.R. § 42.54.

Patent Owner hereby requests that certain additional exhibits, citing to or substantially describing the information contained in the above-listed exhibits, also be sealed, specifically:

IPR2015-01097 (Patent 8,754,131 B2)
IPR2015-01100 (Patent 8,927,606 B1)
IPR2015-01105 (Patent 8,871,813 B2)

- Transcript of Dr. Paulson (Ex. 1123) - 71:13-74:11, 105:13-106:13, 107:4-11, 108:19-109:4, 109:11-16, 113:1-7, 113:16-116:22, 118:7-123:14, 124:11-22, 125:5-6, 125:12-20, 126:2-8, 126:12-22, 127:6-128:3, 128:17-19, 131:5-132:6, 132:9, 132:12-133:21, 134:8-135:1, 137-142:12, 143:21-144:1, 144:7-22, 145:14-146:7, 146:13-15, 146:19-147:9, 147:15-22, 148:12-18, 149:3-7, 149:12-14, 149:17-151:19, 152:15-153:4, 156:10-157:12, 159:7-160:9, 170:19-172:7, 180:9-12, 181:13-19, 182:6-183:9, 183:19-184:19, 187:13-188:15, 191:16-312:10;
- Transcript of Dr. Trattler (Ex. 1120) - 111:10-12;
- Transcript of Dr. Williams (Ex. 1099) - 121:5-18, 122:7-20, 123:1-125:16, 126:4-127:2; and
- Hoffman Declaration (Ex. 1122) - paragraph 19, pg 18, paragraphs 33, 35-38, 40-41, 60, 62, 68-72, 76-77, 81, 85, 89, 91, 102-105, 108-109, 112-113.

Because public disclosure of the contents of these documents, or descriptions of those contents, would disclose confidential business methods of Patent Owner or a third party, Patent Owner requests that the portions of the

IPR2015-01097 (Patent 8,754,131 B2)
IPR2015-01100 (Patent 8,927,606 B1)
IPR2015-01105 (Patent 8,871,813 B2)

above-listed exhibits be sealed, as “PROTECTIVE ORDER MATERIAL”, for the duration of this proceeding.

II. Conclusion

For the reasons set forth above, Patent Owner respectfully requests that the Board grant this motion to seal.

Respectfully,

By: Joshua L. Goldberg/
Joshua L. Goldberg, Backup Counsel
Reg. No. 59,369

Counsel for Patent Owner

IPR2015-01097 (Patent 8,754,131 B2)
IPR2015-01100 (Patent 8,927,606 B1)
IPR2015-01105 (Patent 8,871,813 B2)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **Second Renewed Motion to Seal** was served on August 1, 2016, via email directed to counsel of record for the Petitioner at the following:

Deborah Yellin
DYellin@crowell.com

Jonathan Lindsay
JLindsay@crowell.com

Teresa Stanek Rea
TRea@crowell.com

Chiemi Suzuki
CSuzuki@crowell.com

Shannon Lentz
SLentz@crowell.com

Jitendra Malik
jitty.malik@alston.com

Bryan Skelton
Bryan.skelton@alston.com

Lance Soderstrom
lance.soderstrom@alston.com

Hidetada James Abe
james.abe@alston.com

Joseph M. Janusz
Joe.janusz@alston.com

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