Paper No. _____ Filed: March 17, 2016

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}

SUBMISSION OF REDLINE AMENDED PROPOSED STIPULATED PROTECTIVE ORDER

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)

In accordance with the Board's email of March 14, 2016, the attached Appendix B contains a red-lined version of the Amended Proposed Stipulated Protective Order, filed jointly by the parties on March 8, 2016, relative to the Board's default protective order.

Dated: March 17, 2016

By: /Bryan C. Diner/

Bryan C. Diner, Lead Counsel Reg. No. 32,409 Justin J. Hasford, Back-up Counsel Reg. No. 62,180 Joshua L. Goldberg, Back-up Counsel Reg. No. 59,369 Finnegan, Henderson, Farabow, Garrett & Dunner, L.L.P. 901 New York Ave. NW Washington, DC 20001-4413 Telephone: (202) 408-4000

Counsel for Patent Owner

APPENDIX B

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Paper No. _____ Filed: February 25, 2016

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}

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This standing joint protective order governs the treatment and filing of confidential information, including documents and testimony.⁵

 Marking of Confidential Information. Confidential information shall be clearly marked <u>as either "PROTECTIVE ORDER MATERIAL - BOARD'S EYES</u> <u>ONLY" or "PROTECTIVE ORDER MATERIAL - FED R. EVID 615" or</u> "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.

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⁵ 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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