

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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LUPIN LTD. and LUPIN PHARMACEUTICALS INC.  
Petitioners

v.

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

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IPR2015-01097 (US Patent No. 8,751,131)  
IPR2015-01099 (US Patent No. 8,669,290)  
IPR1015-01100 (US Patent No. 8,927,606)  
IPR2015-01105 (US Patent No. 8,871,813)<sup>1</sup>

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**MOTION FOR *PRO HAC VICE* ADMISSION  
OF CHIEMI SUZUKI**

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

Pursuant to 37 C.F.R. § 42.10(c), Lupin Ltd. and Lupin Pharmaceuticals Inc. (collectively, “Petitioners”), respectfully request the *pro hac vice* admission of Chiemi Suzuki as backup counsel for Petitioners in the current proceedings. Patent Owners have stated that they do not oppose this motion.

In support of this unopposed motion, a declaration of Chiemi Suzuki is submitted as Exhibit 1075 explaining that she satisfies all the criteria for *pro hac vice* admission as set forth in *Unified Patents, Inc. v. Parallel Iron, LLC*, IPR2013-00639, Paper 7 (Oct. 15, 2013).

## **I. Statement of Facts**

1. Patent Owner has informed Petitioners that their Patent Owner Responses that will be forthcoming in these proceedings will include declarations from a number of experts. Thus, Petitioners anticipate the need for additional resources being assigned to these proceedings in the coming months. Accordingly, Petitioners respectfully request the *pro hac vice* admission of Ms. Suzuki, who is a very experienced patent litigator that has established a familiarity with the subject matter at issue in these proceedings.

2. Ms. Suzuki is a member in good standing of the New York and California Bars. She has not had any application denied for admission to practice, nor has she been sanctioned, cited for contempt, suspended or disbarred from practice, before any court or administrative body.

3. Ms. Suzuki is a litigation attorney with over 11 years of experience litigating patents in the pharmaceutical field.

4. Ms. Suzuki is familiar with the subject matter at issue in these proceedings, including U.S. Pat. Nos. 8,751,131 (“the ‘131 patent”), 8,669,290 (“the ‘290 patent”), 8,927,606 (“the ‘606 patent”) and 8,871,813 (“the ‘813 patent”), the Petitions relating to these four patents filed by Petitioners, and the underlying technology as shown in her accompanying February 4, 2016 Declaration (“Suzuki Declaration,” Ex. 1075).

5. In her declaration, Ms. Suzuki also attests to each of the listed items required by the Order – Authorizing Motion for Pro Hac Vice Admission – 37 C.F.R. § 42.10 in IPR2013-00639. Suzuki Declaration ¶¶ 1-11 (Ex. 1075).

## II. Conclusion

For the foregoing reasons, Petitioners respectfully request that the Board admit Chiemi Suzuki *pro hac vice* in these proceedings.

Respectfully submitted,

February 4, 2016

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**CERTIFICATION OF SERVICE**

The undersigned hereby certifies that the foregoing “MOTION FOR PRO HAC VICE ADMISSION OF CHIEMI SUZUKI” and accompanying Exhibit 1075 were served electronically via email on February 4, 2016 to Patent Owner’s counsel of record upon the following:

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