IPR2015-01778 Patent No. 8,603,506

Patent Owner	Docket No.:	105153-0104

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DR. REDDY'S LABORATORIES, LTD. and DR. REDDY'S LABORATORIES, INC. Petitioner

v.

GALDERMA LABORATORIES, INC.
Patent Owner

Patent No. 8,603,506 Issue Date: December 10, 2013

Title: METHOD OF TREATING ACNE

Case IPR2015-01778

PATENT OWNER PRELIMINARY RESPONSE



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	C. "PAPULES" AND "PUSTULES"
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VI.	PETITION FAILS TO DEMONSTRATE A REASONABLE LIKELIHOOD OF SUCCESS
	The Application Group Leading to the '506 Patent describes treatment of "rosacea"
	2. The Application Group Leading to the '506 Patent expressly describes papules and pustules of rosacea as a symptom to be treated in accordance with the claims
	3. The Application Group Leading to the '506 Patent describes treating papules and pustules of rosacea with doxycycline25
	4. The Application Group Leading to the '506 Patent describes treating papules and pustules of rosacea with the claimed doses of doxycycline
	5. The Application Group Leading to the '506 Patent describes treating papules and pustules of rosacea "without administering a bisphosphonate compound"



	6.	The Application Group Leading to the '506 Patent provides an example of treating inflammatory papules and pustules—symptoms of acne rosacea
	7.	The '506 Patent's discussion of "antibiotic" and "sub-antibiotic" dosing is unambiguous and inconsequential to written description32
	8.	Whether the claimed method can also treat telangiectasia is immaterial
	9.	Each Ground of Unpatentability in the Petition relies on unsupported, conclusory statements in the Payette Declaration (Ex. 1004)
VII.	EACH C	ECIFICATION OF THE '506 PATENT IS IDENTICAL TO FE THE THREE NON-PROVISIONAL DOCUMENTS IN NTINUOUS PRIORITY "CHAIN" CONSTITUTING THE CATION GROUP LEADING TO THE '506 PATENT"
VIII.		ARD SHOULD DENY THE PETITION BASED ON ITS FORILY VESTED DISCRETION
	TH	HE PETITION SHOULD BE DENIED BECAUSE IT IS A HINLY VEILED ATTEMPT TO CIRCUMVENT 35 U.S.C. § 1(B)
		HE PETITION SHOULD BE DENIED UNDER 35 U.S.C. § 325(D) S DUPLICATIVE OF EXAMINATION42
IX.	CONCL	USION45



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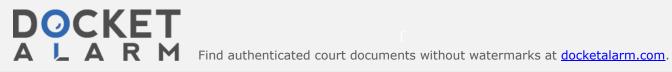
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