Filed on behalf of Coalition for Affordable Drugs VIII, LLC

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UNITED	STATE	ES PATEN	NT AND	TRAI	DEMARK	OFFICE
BEFORE	THE	PATENT	TRIAL	AND	APPEAL	BOARI

COALITION FOR AFFORDABLE DRUGS VIII, LLC, Petitioner

v.

TRUSTEES OF THE UNIVERSITY OF PENNSYLVANIA, Patent Owner, based on Electronic Records of PTO U.S. Patent 7,932,268 to Rader

IPR Trial No. IPR2015-01836

Petitioner's Opposition To Patent Owner's Contingent Motion To Amend

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Patent Trial and Appeal Board
U.S. Patent and Trademark Office
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I.		SHOULD BE DENIED1			
II.	BEC	AUSE	OWNER'S MOTION IS FACIALLY DEFICIENT IT LACKS THE REQUIRED CLAIM CTION		
III.	PATI	ENT OWNER DID NOT ESTABLISH THAT THE '268 ENT IS ENTITLED TO CLAIM PRIORITY TO CERTAIN VICAL TRIALS			
IV.	SUB	STITU	OWNER HAS NOT DEMONSTRATED THAT THE ITE CLAIMS ARE PATENTABLE OVER THE PRIOR4		
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EXHIBIT LIST PURSUANT TO 37 C.F.R. § 42.63(e) AND TABLE OF ABBREVIATIONS



Ex. No.	Description			
1001	Certified U.S. Patent No. 8,618,135 to Rader.			
1002	Declaration of Randall M. Zusman, M.D.			
1003	Declaration of Michael Mayersohn, Ph.D.			
1004	Affidavit of Christopher Butler, Office Manager, Internet Archive, authenticating Internet Archive URLs (June 16, 2015) (attaching as Ex. A:			
	PPD News & IR Presentations (2004/04/15) (available at https://web.archive.org/web/20040415065142/http://ppdi.com/PPD_6_12.htm)).			
1005	Affidavit of Christopher Butler, Office Manager, Internet Archive, authenticating Internet Archive URLs (June 12, 2015) (attaching as Ex. A:			
	PPD News Releases(2004/02/13) (available at https://web.archive.org/web/20040213233245/http://www.ppdi.com/PPD_U6.htm?ID=126662);			
	PPD News & IR Presentations(2003/12/12) (available at https://web.archive.org/web/20031212193444/http://ppdi.com/PPD_6 _12.htm);			
	PPD News & IR Presentations (2004/06/04) (available at https://web.archive.org/web/20040604203252/http://www.ppdi.com/PPD_6_12.htm)).			
1006	Certified U.S. Provisional Patent Application No. 60/550,915.			
1007	U.S. Patent No. 8,618,135 (highlighting dosing information not present in U.S. Provisional Patent Application No. 60/550,915).			
1008	U.S. Patent Application No. 13/046,118.			
1009	In re Application of: Rader, U.S. Patent Application No. 13/046,118, Amendment and Response to Oct. 2, 2012 Office Action (Mar. 4, 2013).			



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