## UNITED STATES PATENT AND TRADEMARK OFFICE

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## BEFORE THE PATENT TRIAL AND APPEAL BOARD

COALITION FOR AFFORDABLE DRUGS V LLC;
HAYMAN CREDES MASTER FUND, L.P.;
HAYMAN ORANGE FUND SPC – PORTFOLIO A;
HAYMAN CAPITAL MASTER FUND, L.P.;
HAYMAN CAPITAL MANAGEMENT, L.P.;
HAYMAN OFFSHORE MANAGEMENT, INC.;
HAYMAN INVESTMENTS, LLC;
NXN PARTNERS, LLC;
IP NAVIGATION GROUP, LLC;
J KYLE BASS, and ERICH SPANGENBERG,
Petitioner,

v.

BIOGEN MA INC., Patent Owner.

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Case: IPR2015-01993 U.S. Patent No. 8,399,514

**BIOGEN'S LIST OF PROPOSED MOTIONS** 



Case No. IPR2015-01993 Patent 8,399,514

Pursuant to the Board's Scheduling Order (Paper 21) setting an Initial Conference Call for April 19, 2016, and directing the parties to page 48765 of the Patent Office Trial Practice Guide, 77 Fed. Reg. 48756, Patent Owner Biogen MA Inc. submits this list of proposed motions presently contemplated by Biogen for which it intends to request authorization during the Initial Conference Call:

- Motion to Antedate Kappos 2006 (Ex. 1003A) (see Volkswagen Grp. of Am. v. Emerachem Holdings, LLC, IPR2014-01557, Paper 17 (PTAB May 4, 2015)); and
- Motion to Seal Confidential Information/Motion for Protective Order.

Although Biogen does not presently contemplate filing additional motions, it reserves the right to seek subsequent authorization for motions consistent with the Board's Rules.

Respectfully submitted,

Dated: April 15, 2016 By: <u>/Erin M. Sommers/</u>

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Counsel for Patent Owner in IPR2015-01993



## **CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing BIOGEN'S LIST OF

**PROPOSED MOTIONS** was served electronically via e-mail on April 15, 2016,

in its entirety on the following:

James T. Carmichael Carol A. Spiegel Carmichael IP, PLLC 8000 Towers Crescent Drive, 13th Floor Tysons Corner, VA 22182 jim@carmichaelip.com carol@carmichaelip.com

Petitioner has agreed to electronic service.

Dated: April 15, 2016 By: <u>/Erin M. Sommers /</u>

Erin M. Sommers, Reg. No. 60,974

FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER, LLP

