Filed on behalf of Patent Owners Genentech, Inc. and City of Hope by:

1875 Pennsylvania Ave., NW

Washington, DC 20006

David L. Cavanaugh	Adam R. Brausa	Jeffrey P. Kushan
Reg. No. 36,476	Reg. No. 60,287	Reg. No. 43,401
Heather M. Petruzzi	Daralyn J. Durie	Peter S. Choi
Reg. No. 71,270	Pro Hac Vice Application	Reg. No. 54,033
Robert J. Gunther, Jr.	Pending	Sidley Austin LLP
Pro Hac Vice Application	Durie Tangri LLP	1501 K Street, N.W.
Pending	217 Leidesdorff Street	Washington, D.C.
Wilmer Cutler Pickering	San Francisco, CA 94111	20005
Hale and Dorr LLP		

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GENZYME CORPORATION, Petitioner

V.

GENENTECH, INC. AND CITY OF HOPE Patent Owners

Case IPR2016-00383 Patent 6,331,415

PATENT OWNERS' PRELIMINARY RESPONSE UNDER 37 C.F.R. § 42.107



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C.	Southern (Ex. 1004)
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A.	GROUND 1: The '383 Petition Fails to Demonstrate a Reasonable Likelihood of Showing That Salser Anticipates Claims 1-4, 9, 11, 12, 15-20 and 33
1	. Salser Does Not Disclose the Production of Immunoglobulins
2	Salser Does Not Disclose Transformation of a Single Host Cell with Multiple DNA Sequences Encoding Immunoglobulin Heavy and Light Chains
3	. The Petition Does Not Cite Any Relevant Example of Protein Expression in Salser
4	Salser Does Not Disclose a Vector Including Both Heavy and Light Chain Sequences as Required by Claim 15
5	. The Board Has Already Rejected Substantially Similar Anticipation Grounds Based on Bujard
В.	GROUND 2: The Petition Fails to Demonstrate a Reasonable Likelihood of Showing Claims 1-4, 9, 11, 12, 14-20, and 33 Are Obvious Over Salser in View of Ochi
C.	GROUND 3: Petitioner Has Failed to Demonstrate a Reasonable Likelihood of Showing Claims 2, 18, and 20 Are Obvious Over Salser in View of Southern
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