

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

DR. REDDY'S LABORATORIES, LTD. AND DR. REDDY'S  
LABORATORIES, INC.,  
Petitioners,

v.

MONOSOL RX, LLC,  
Patent Owner.

---

Patent No. 8,603,514

Issue Date: December 10, 2013

Title: UNIFORM FILMS FOR RAPID DISSOLVE DOSAGE FORM  
INCORPORATING TASTE-MASKING COMPOSITIONS

*Inter Partes* Review No. IPR2016-01111

---

**PETITIONER'S OPPOSITION TO PATENT OWNER MONOSOL RX,  
LLC'S MOTION FOR ADDITIONAL DISCOVERY<sup>1</sup>**

---

<sup>1</sup> Corresponding opposition briefs are being filed in IPR2016-01112 and IPR2016-01113.

**TABLE OF CONTENTS**

	<b><u>Page</u></b>
I. PATENT OWNER POINTS TO NO EVIDENCE OF PRIVACY BETWEEN PETITIONER AND TEVA.....	1
A. There Is No Evidence Of Any Kind That Privity Existed Between Petitioner And Teva On December 3, 2014.....	2
B. Patent Owner Offers No Evidence That Privity Existed Between Petitioner And Teva On May 31, 2016.....	4
II. THE PATENT OWNER’S MOTION IS BASED ON AN ERRONEOUS THEORY OF PRIVACY .....	7
A. Successive Ownership Of The Same Allegedly Infringing Property Does Not Create Privity .....	7
III. THE DISCOVERY REQUESTED IS NOT “NECESSARY IN THE INTEREST OF JUSTICE” .....	12
A. Patent Owner’s Requested Discovery Will Not Yield “Useful Information”.....	13
B. Patent Owner Has The Ability To Seek Equivalent Information By Other Means .....	13
C. The Requests Are Overly Burdensome.....	14
IV. CONCLUSION.....	15

**TABLE OF AUTHORITIES**

**Page(s)**

**Cases**

*Aruze Gaming Macau, Ltd. V. Gaming, Inc.*,  
IPR2014-01288, Paper 13 (PTAB Feb. 20, 2015) ..... 2, 3, 10

*Garmin Int’l v. Cuozzo Speed Tech.*,  
IPR2012-00001, Paper 26 (PTAB Jan. 9, 2013) ..... 1, 14, 15

*Hewlett-Packard Company v. MCM Portfolio, LLC*,  
IPR2013-00217, Paper 10 (PTAB Sept. 1, 2013) .....9

*Nestle USA, Inc. v. Steuben Foods, Inc.*,  
IPR2014-01235, Paper 12 (PTAB Dec. 22, 2014) .....9

*Synopsys, Inc. v. Mentor Graphics Corp.*,  
814 F.3d 1309 (Fed. Cir. 2016) .....2

*Synopsys, Inc. v. Mentor Graphics Corp.*,  
IPR2012-00042, Paper 16 (PTAB Feb. 22, 2013) ..... passim

*Synopsys, Inc. v. Mentor Graphics Corp.*,  
IPR2012-00042, Paper 23 (PTAB Feb. 22, 2013) .....7, 11

*Synopsys, Inc. v. Mentor Graphics Corp.*,  
IPR2012-00042, Paper 24 (PTAB Feb. 22, 2013) ..... 2, 7, 11, 12

*Synopsys, Inc. v. Mentor Graphics Corp.*,  
IPR2012-00042, Paper 60 (PTAB Feb. 22, 2013) ..... 3, 4, 7, 12

*Taylor v. Sturgell*,  
553 U.S. 880 (2008).....9, 10

**Statutes**

35 U.S.C. § 315(b) ..... passim

**Other Authorities**

37 CFR 42.51(b)(2)(i) .....1

**Rules**

Fed.R.Civ.P. 26(b)(1).....14

**PETITIONER’S EXHIBIT LIST**

<b>Exhibit No.</b>	<b>Reference</b>
1041	Federal Trade Commission Press Release entitled, “FTC Requires Teva to Divest Over 75 Generic Drugs to Settle Competition Concerns Related to its Acquisition of Allergan’s Generic Business,” dated July 27, 2016
1042	Dr. Reddy’s Laboratories Ltd. Press Release entitled, “Dr. Reddy’s completes acquisition of product portfolio from TEVA,” dated August 3, 2016

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.