

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MYLAN PHARMACEUTICALS INC., TEVA PHARMACEUTICALS USA,
INC. and AKORN INC.,¹

Petitioners,

v.

ALLERGAN, INC.

Patent Owner.

Case IPR2016-01127 (8,685,930 B2)
Case IPR2016-01128 (8,629,111 B2)
Case IPR2016-01129 (8,642,556 B2)
Case IPR2016-01130 (8,633,162 B2)
Case IPR2016-01131 (8,648,048 B2)
Case IPR2016-01132 (9,248,191 B2)

**DECLARATION OF SHANNON M. BLOODWORTH IN SUPPORT OF
PETITIONER MYLAN PHARMACEUTICAL INC.'S MOTION FOR
PRO HAC VICE ADMISSION OF SHANNON M. BLOODWORTH
UNDER 37 C.F.R. § 42.10(c)**

¹ Cases IPR2017-00576 and IPR2017-00594, IPR2017-00578 and IPR2017-00596, IPR2017-00579 and IPR2017-00598, IPR2017-00583 and IPR2017-00599, IPR2017-00585 and IPR2017-00600, and IPR2017-00586 and IPR2017-00601, have respectively been joined with the captioned proceedings. The word-for-word identical paper is filed in each proceeding identified in the caption pursuant to the Board's Scheduling Order (Paper 10).

I, SHANNON M. BLOODWORTH, declare as follows:

1. I am more than twenty-one years of age, competent to present this affidavit, and have personal knowledge of the facts set forth herein.
2. This affidavit is given in support of Petitioner's Mylan Pharmaceutical Inc.'s Motion for *Pro Hac Vice* Admission of Shannon M. Bloodworth under 37 C.F.R. § 42.10(c).
3. I am a partner in the patent litigation group at Perkins Coie LLP.
4. I am a member in good standing of the Bar of the States of Maryland and Wisconsin, the Commonwealth of Virginia and the District of Columbia. I am also admitted to practice before the United States Courts of Appeals for the Fourth Circuit, D.C. Circuit, Federal Circuit and the United States Supreme Court. I am admitted to practice before the United States District Courts for D.C. and Maryland, and the Supreme Courts of Virginia and Wisconsin.
5. My Bar membership numbers are VA 46671, DC 474925 and WI 1088470.
6. I have been practicing law for almost 16 years, including litigating patent cases, specifically focused on pharmaceutical patent cases, for the last 15 years.
7. More generally, I have represented the Mylan and/or its various related entities in litigating significant pharmaceutical patent cases, such as the

following cases:

- *Teva Pharmaceuticals USA Inc., et al. v. Mylan Pharmaceuticals Inc., et al.*, Civil Action No. 1:09-cv-08824-WHP (U.S. District Court for the Southern District of New York);
- *Teva Pharmaceuticals USA Inc., et al. v. Mylan Pharmaceuticals Inc., et al.*, No. 10-cv-7246 (KBF) (U.S. District Court for the Southern District of New York);
- *Teva Pharmaceutical USA Inc., et al. v. Mylan Pharmaceutical Inc., et al.*, Civil Action No. 1:14-cv-01278-GMS (U.S. District Court of District of Delaware);
- *Apotex, Inc. v. Daiichi Sankyo, Inc. et al.*, Civil Action No. 1:15-cv-03695 (U.S. District Court for the Northern District of Illinois);
- *Janssen Biotech, Inc. et al. v. Mylan Pharmaceuticals Inc., et al.*, Civil Action No. 2:15-cv-05909-KM-JBC (U.S. District Court for the District of New Jersey);
- *Astrazeneca Pharmaceuticals LP v. Agila Specialties Inc. et al.*, Civil Action No. 1:15-cv-06039-RMB-KMW (U.S. District Court for the District of New Jersey);
- *Astrazeneca AB et al. v. Mylan Laboratories Ltd.*, Civil Action No. 3:12-cv-01378-MLC-TJB (U.S. District Court for the District of New Jersey);

- *The Medicines Co. v. Mylan Inc.*, Civil Action No. 1:11-cv-01285 (U.S. District Court for the Northern District of Illinois);
 - *Teva Neuroscience, Inc. et al. v. Mylan Inc. et al.*, Civil Action No. 2:10-cv-05078-CCC-JBC (U.S. District Court for the District of New Jersey);
- and
- *Novo Nordisk Inc. v. Mylan Pharmaceutical Inc., et al.*, Civil Action No. 3:09-cv-02445-FLW-DEA (United States District Court for the District of New Jersey).

8. I have never been disbarred, sanctioned or cited for contempt by any court or administrative body. I am not currently suspended in any bar or by any court or administrative body.²

9. I have never had a court deny my application for admission to practice.

10. I am familiar with the subject matter of this proceeding.

11. Given my familiarity with the underlying facts and my litigation experience with the Federal Rules of Evidence, I have experience and expertise important to representing Mylan's interests in this matter.

² In May 2004, during transition to a new law firm, my DC Bar dues were inadvertently not paid. As soon as I discover the non-payment, I immediately paid all outstanding dues and was reinstated. I have been a member in good standing ever since.

12. I have read and will comply with Office Patent Trial Practice guide and the Board's Rules of Practice for Trials, as set forth in Part 42 of 37 C.F.R.

13. I agree to be subject to the United States Patent and Trademark Office Code of Professional Responsibility set forth in 37 C.F.R. §§ 11.101 *et seq.* and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

14. I have previously applied for admission pro hac vice before the United States Patent and Trademark Office in the following IPRs:

- a. IPR No. 2015-00643
- b. IPR No. 2015-00644
- c. IPR No. 2015-00830

15. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements are made with the knowledge that willful false statements and the like are punishable by fine, imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

September 21, 2017

/s/ Shannon M. Bloodworth
Shannon M. Bloodworth