

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.

SAINT REGIS MOHAWK TRIBE and ALLERGAN, INC.,
Patent Owners.

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

**PETITIONER MYLAN PHARMACEUTICALS INC.'S CORRECTED
MOTION FOR PRO HAC VICE ADMISSION 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).

This paper replaces Paper No. 76 in IPR2016-01127, Paper No. 78 in IPR2016-01128, and Paper No. 75 in each of IPR Nos. 2016-01129, 2016-01130, 2016-01131, and 2016-01132. Pursuant to 37 C.F.R. § 42.10(c), Petitioner Mylan Pharmaceuticals Inc. (“Petitioner”) respectfully requests that the Board recognize (1) Shannon M. Bloodworth, (2) Charles G. Curtis, Jr., (3) Jennifer A. MacLean, and (4) Benjamin S. Sharp as counsel pro hac vice in this proceeding. Petitioner seeks the counsel of Shannon Bloodworth due to her experience in pharmaceutical patent matters. Petitioner seeks the counsel of Charles G. Curtis, Jr., Jennifer A. MacLean, and Benjamin S. Sharp for their expertise in claims of Tribal sovereign immunity. This corrected motion is authorized by the Board’s February 28, 2019 email, and by Paper No. 4.

I. STATEMENT OF FACTS

A. Shannon M. Bloodworth

Ms. Bloodworth is a patent litigation attorney with experience representing clients in multiple jurisdictions, including United States District Courts and the Federal Circuit Court of Appeals. Ms. Bloodworth has experience in all stages of litigation, from preliminary injunction through trial and appeal, and across a wide range of technologies, including pharmaceutical drugs, formulations, and dosages. Ms. Bloodworth has previously been admitted pro hac vice to three inter partes reviews: IPR No. 2015-00643, IPR No. 2015-00644, and IPR No. 2015-00830.

B. Charles G. Curtis, Jr.

Mr. Curtis has extensive experience litigating cases involving Indian law in many different courts across the United States, as well as Federal administrative boards. He specifically has extensive experience litigating cases involving Indian law. Many of these cases have involved disputed claims of Tribal sovereign immunity. He has represented private and public clients in litigation, agency proceedings, and business negotiations involving Native American tribes, tribal entities, and tribal members throughout the country, including with respect to the St. Regis Mohawk (Akwasasne) Tribe. He also has experience in constitutional, treaty rights, and intellectual property law.

C. Jennifer A. MacLean

Ms. MacLean has extensive experience litigating cases involving Indian law in many different courts across the United States, as well as Federal administrative boards. She has over 16 years of experience litigating Indian law and tribal sovereign immunity . Her practice focuses on helping State and local governments, businesses and community groups navigate issues related to Federal Indian law. Her experience in this area includes aboriginal land claims, treaty disputes, compact negotiations, Tribal acknowledgment, and Federal preemption questions.

D. Benjamin S. Sharp

Mr. Sharp has extensive experience litigating cases involving Indian law in many different courts across the United States, as well as Federal administrative boards, specifically including issues of Tribal sovereign immunity.

E. Meet & Confer

Counsel for the Tribe indicated that it did not oppose this motion.

II. DECLARATION OF INDIVIDUAL SEEKING TO APPEAR

This Motion for *Pro Hac Vice* Admission is accompanied by a Declaration of Shannon M. Bloodworth (EX1138), a Declaration of Charles G. Curtis, Jr. (EX1139), a Declaration of Jennifer A. MacLean (EX1140), and a Declaration of Benjamin S. Sharp (EX1142). In each declaration, the declarant attests to each of the listed items required by the Order Authorizing Motion for *Pro Hac Vice* Admission in Case IPR2013-00639, Paper 7.

III. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the Board admit Shannon M. Bloodworth, Charles G. Curtis, Jr., Jennifer A. MacLean, and Benjamin S. Sharp as counsel *Pro Hac Vice* in this proceeding.

Respectfully submitted,

Dated: February 28, 2019

/ Steven W. Parmelee /
Steven W. Parmelee, Lead Counsel
Reg. No. 31,990

CERTIFICATE OF SERVICE

This is to certify that I caused to be served true and correct copy of the foregoing Petitioner Mylan Pharmaceuticals Inc.'s Corrected Motion for Pro Hac Vice Admission Under 37 C.F.R. § 42.10(c) on this 28th day of February, 2019, on the Patent Owner at the correspondence address of the Patent Owner as follows:

Dorothy P. Whelan
Michael Kane
Susan Morrison Colletti
Robert M. Oakes
Jonathan Singer
FISH & RICHARDSON P.C.
3200 RBC Plaza
60 South Sixth Street
Minneapolis, MN 55402
Email: IPR13351-0008IP1@fr.com
Email: IPR13351-0008IP2@fr.com
Email: IPR13351-0008IP3@fr.com
Email: IPR13351-0008IP4@fr.com
Email: IPR13351-0008IP5@fr.com
Email: IPR13351-0008IP6@fr.com
Email: PTABInbound@fr.com

Alfonso Chan
Joseph DePumpo
Michael W. Shore
Christopher L. Evans
SHORE CHAN DEPUMPO LLP
901 Main Street, Suite 3300
Dallas, TX 75201
Email: achan@shorechan.com
Email: jdepumpo@shorechan.com
Email: mshore@shorechan.com
Email: cevans@shorechan.com

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