

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ACRUX DDS PTY LTD. & ACRUX LIMITED
Petitioners

v.

KAKEN PHARMACEUTICAL CO., LTD. and
VALEANT PHARMACEUTICALS INTERNATIONAL, INC.
Patent Owner and Licensee

Case No.: IPR2017-00190
Patent No. 7,214,506 B2

**REPLY DECLARATION OF KENNETH A. WALTERS, PH.D. IN SUPPORT
OF PETITION FOR *INTER PARTES* REVIEW OF PATENT NO. 7,214,506**

ACRUX DDS PTY LTD. et al.
EXHIBIT 1509

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	SUMMARY	2
III.	ATTEMPTS TO NARROW CLAIM SCOPE LACK MERIT	3
IV.	DR. ELEWSKI MISCHARACTERIZES JP '639, THE '367 PATENT, AND HAY	16
A.	Dr. Elewski's Attacks on JP '639 are Baseless.....	18
B.	Dr. Elewski's Attacks on the '367 Patent are Baseless	20
C.	Dr. Elewski's Attacks on the Hay Reference are Baseless.....	23
V.	DR. ELEWSKI MISCHARACTERIZES THE KAKEN ABSTRACTS	30
VI.	DR. ELEWSKI MISCHARACTERIZES OGURA	43
VII.	TOPICAL ONYCHOMYCOSIS TREATMENTS WERE KNOWN.....	53
VIII.	DR. ELEWSKI'S ATTACKS ON THE MOLECULAR WEIGHT OF EFINACONAZOLE LACK MERIT	61
IX.	IT WAS KNOWN THAT KP-103 IS NOT INACTIVATED BY KERATIN UNLIKE OTHER TOPICAL ANTIFUNGAL AGENTS.....	69
X.	DR. ELEWSKI'S ARGUMENT THAT HYDROPHILIC MOLECULES WERE DISFAVORED LACKS MERIT.....	75
XI.	DR. ELEWSKI'S OTHER ARGUMENTS ARE ALSO CONTRADICTED BY THE PRIOR ART.....	77
XII.	EFINACONAZOLE WAS ALREADY A KNOWN POTENT TOPICAL ANTIFUNGAL COMPOUND BY 1999.....	81
XIII.	POSAS WERE MOTIVATED TO TREAT ONYCHOMYCOSIS TOPICALLY WITH POTENT ANTIFUNGAL AGENTS SUCH AS EFINACONAZOLE	88

XIV. PATENT OWNER’S ATTACKS ON MY EXPERTISE LACK
MERIT91

XV. CONCLUSIONS93

I, Kenneth A. Walters, Ph.D., hereby state the following:

I. INTRODUCTION

1. In this declaration, I am providing my expert opinions in support of Petitioners' Petition for *Inter Partes* Review of Patent No. 7,214,506 (the "'506 patent") and in reply to Patent Owner's Response, including the Declaration of Boni E. Elewski, M.D., pursuant to 37 C.F.R. § 42.120.

2. I previously provided a declaration dated October 28, 2016, as part of the petition filed by Petitioners that led to this proceeding. My previous declaration is Ex. 1005. I am competent to make this declaration based upon my personal knowledge and technical expertise.

3. All of the exhibits I have considered and on which I have relied in this proceeding are the kinds of documents on which I typically rely when forming scientific opinions, including the opinions I have offered in this proceeding.

4. I reserve the right to supplement my opinions to address any information obtained, or positions taken, based on any new information that comes to light throughout this proceeding.

5. I have read the Declaration of Boni E. Elewski, M.D. (Ex. 2027). Her declaration does not change my previous opinions.

6. In forming my opinions, I considered and relied on my knowledge, education, experience, the references identified in Ex. 1005 and in this declaration.

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