

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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ACRUX DDS PTY LTD. & ACRUX LIMITED  
Petitioners

v.

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

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

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**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  
IPR Decision

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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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