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

IDD D-1;1;--- C-



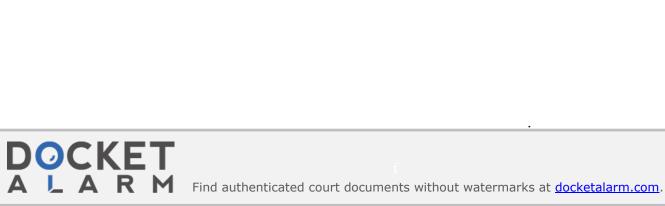
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I, Kenneth A. Walters, Ph.D., hereby state the following:

I. <u>INTRODUCTION</u>

- 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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