

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

MYLAN PHARMACEUTICALS INC.,  
Petitioner

v.

QUALICAPS CO., LTD,  
Patent Owner

---

Case IPR2017-00203  
Patent 6,649,180

---

**DECLARATION OF MEGAN P. KEANE IN SUPPORT OF  
PATENT OWNER'S MOTION FOR ADMISSION *PRO HAC VICE* OF  
MEGAN P. KEANE UNDER 37 C.F.R. § 42.10**

I, Megan P. Keane, declare as follows:

1. I am an associate in the law firm Covington & Burling LLP.
2. I am a member in good standing of the Pennsylvania State Bar (admitted 2009) and the District of Columbia Bar (2010), as well as the following federal Courts: U.S. District Court for the District of Columbia (2012) and the U.S. Court of Appeals for the Federal Circuit (2016).
3. I have never been suspended or disbarred from practice before any court or administrative body.
4. I have never had an application for admission to practice before any court or administrative body denied.
5. I have had no sanctions or contempt citations imposed against me by any court or administrative body.
6. I have read and will comply with the Office Patent Trial Guide and the Board's Rules for Practice for Trials set forth in part 42 of the Code of Federal Regulations.
7. I agree to be subject to the USPTO Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 *et seq.* and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

8. I have previously applied to appear *pro hac vice* in one proceeding before the Office, on behalf of Eli Lilly and Company in IPR2016-00458. The *pro hac vice* motion was granted by the Office.

9. I am an experienced litigating attorney with over seven years in private law practice, including experience with bench trials, jury trials, and *Markman* hearings. I have been counsel in over twenty patent infringement cases, including cases pending in various district courts.

10. I am familiar with the subject matter and U.S. Patent No. 6,649,180 (“the ’180 Patent”) at issue in this proceeding, including its prosecution history and the scientific field to which the ’180 Patent is addressed. In particular, I am advising the Patent Owner regarding the Patent Owner’s Response to the Petition, and have thereby developed a thorough understanding of the ’180 Patent, the relevant art, and scientific field. In addition, I am or have been counsel of record in patent infringement cases involving pharmaceutical formulation patents. These activities have required developing a thorough understanding of the patent at issue in this proceeding, the prior art, and the relevant scientific field.

11. I also have extensive experience litigating and advising clients relating to pharmaceutical patents. Specifically, I have experience working with experts and developing strategy in proceedings before the Patent Trial and Appeal Board relating to other pharmaceutical products. In addition, I have been counsel

of record in over fifteen district court cases in which pharmaceutical patents were at issue.

12. 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 so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Dated: 5/24/17

By   
Megan P. Keane  
Covington & Burling LLP  
One CityCenter  
850 Tenth Street, NW  
Washington, DC 20001  
(202) 662-6000