

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FAMY CARE LIMITED
Petitioner

v.

ALLERGAN, INC.
Patent Owner

U.S. Patent No. 9,248,191 B2 to Acheampong *et al.*

Issue Date: February 2, 2016

Title: Methods of Providing Therapeutic Effects Using Cyclosporin Components

Inter Partes Review Trial No. 2017-00569

Petition for *Inter Partes* Review of U.S. Patent No. 9,248,191

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U.S. Patent and Trademark Office
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Petition for *Inter Partes* Review of U.S. Patent No. 9,248,191 B2

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A. “therapeutically effective,” “effective,” “lacrimonal gland tearing,” “overall efficacy substantially equal to,” “as much therapeutic efficacy as”17

B. “buffer”18

C. “substantially no detectable concentration”19

D. “demonstrates a reduction in adverse events”19

E. “breaks down”20

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TABLE OF ABBREVIATIONS

Exhibit	Description of Exhibit
1001	U.S. Patent No. 9,248,191 B2 to Acheampong et al., filed March 21, 2014 (“the ’191 patent”)
1002	Declaration of Dr. Peter Kador
1003	Declaration of Dr. Michael A. Lemp
1004	File history of U.S. Patent No. 9,248,191 B2 to Acheampong et al. (“’191 patent FH”)
1005	File history of U.S. Patent Application No. 10/927,857 to Acheampong et al., filed August 27, 2004 (“’857 application FH”)
1006	U.S. Patent No. 5,474,979 to Ding et al., filed May 17, 1994 (“Ding ’979”)
1007	K. Sall et al., <i>Two Multicenter, Randomized Studies of the Efficacy and Safety of Cyclosporine Ophthalmic Emulsion in Moderate to Severe Dry Eye Disease</i> , 107 OPTHALMOLOGY 631 (2000) (“Sall”)
1008	A. Acheampong et al., <i>Cyclosporine Distribution into the Conjunctiva, Cornea, Lacrimal Gland, and Systemic Blood Following Topical Dosing of Cyclosporine to Rabbit, Dog, and Human Eyes</i> , in 2 LACRIMAL GLAND, TEAR FILM, & DRY EYE SYNDROMES 1001 (David A. Sullivan et al. eds., 1998) (“Acheampong”)
1009	U.S. Patent No. 5,578,586 to Glonek et al., filed February 4, 1994 (“Glonek”)
1010	U.S. Patent No. 5,981,607 to Ding et al., filed January 20, 1998 (“Ding ’607”)
1011	R. Kaswan, <i>Intraocular Penetration of Topically Applied Cyclosporine</i> , 20 TRANSPL. PROC. 650 (1988) (“Kaswan”)
1012	K. Kunert et al., <i>Analysis of Topical Cyclosporine Treatment of Patients with Dry Eye Syndrome</i> , 118 ARCH OPHTHALMOL 1489 (2000) (“Kunert”)
1013	PHYSICIANS’ DESK REFERENCE FOR OPTHALMOLOGY 13-18 (Medical Economics Co., 27th ed. 1999) (“Ophthalmic PDR”)
1014	K. Turner et al., <i>Interleukin-6 Levels in the Conjunctival Epithelium of Patients with Dry Eye Disease Treated with Cyclosporine Ophthalmic Emulsion</i> , 19 CORNEA 492 (2000) (“Turner”)
1015	D. Stevenson et al., <i>Efficacy and Safety of Cyclosporin A Ophthalmic Emulsion in the Treatment of Moderate-to-Severe Dry Eye Disease</i> , 107 OPTHALMOLOGY 967 (2000) (“Stevenson”)

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