

Filed On Behalf Of:
Novartis Pharmaceuticals Corporation

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WEST-WARD PHARMACEUTICALS INTERNATIONAL LIMITED,
Petitioner,

v.

NOVARTIS PHARMACEUTICALS CORPORATION,
Patent Owner.

Case IPR2017-01592¹
Patent No. 8,410,131

**PATENT OWNER'S OBJECTIONS TO PETITIONER'S
DEMONSTRATIVE EXHIBITS FOR THE ORAL ARGUMENT**

¹ IPR2018-00507 has been joined to this proceeding (Paper 29, Apr. 3, 2018).

Patent Owner objects² to the following demonstratives served on September 13, 2018, by Petitioner on the grounds set forth below:

PDX5 (citing Ex. 1159 ¶ 18); **PDX47** (citing Exs. 1080, 1083, 1131, 2058); and **PDX48** (citing Ex. 1159 ¶ 100) rely on new evidence not cited in Paper 1 or 39 (*see* Paper 61 at 1, 4);

PDX48 (citing Paper 39 at 11-12; Ex. 1006; Ex. 1039 at 2-3; Ex. 1081) contains new argument and new reliance on specific pages of Ex.1039 not included in Paper 1 or 39;

PDX16-18, 21 (citing Paper 39 at 11-12; Ex. 1006 at 6683; Ex. 1159 ¶¶ 101-103; Ex. 2027 at 163:18-164:15; Ex. 1085); **PDX20** (citing Paper 39 at 11; Ex. 1006 at 6683; Ex. 2027 at 163:18-164:15; Ex. 1085) rely on arguments and evidence not cited in Ground 1 (or Grounds 2 and 3);

PDX33, 40 (Ex. 1004 at 630 (beginning “It was of interest...”)); **PDX34, 55** (Ex. 1005 at 1 (first callout beginning “mTOR TARGETING...”)); **PDX36** (Ex. 1006 at 6680 (third passage beginning “However, the poor...”)); and **PDX38** (Ex. 1006 at 6680) newly focus on different aspects or portions of the exhibits than were relied on in Paper 1 or 39.

Date: September 14, 2018

Respectfully submitted,

/ Nicholas N. Kallas /
Nicholas N. Kallas (Reg. No. 31,530)

² The parties met and conferred but were unable to resolve these objections.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing PATENT OWNER'S OBJECTIONS TO PETITIONER'S DEMONSTRATIVE EXHIBITS FOR THE ORAL ARGUMENT was served on September 14, 2018 by causing it to be sent by email to counsel for Petitioner at the following email addresses:

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Dated: September 14, 2018

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