

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MYLAN PHARMACEUTICALS INC.
Petitioner

v.

POZEN INC. and HORIZON PHARMA USA, INC.
Patent Owners

Case No. IPR2017-01995
Patent No. 9,220,698

**DECLARATION OF SUSAN KRUMPLITSCH IN SUPPORT OF MOTION
TO APPEAR PRO HAC VICE ON BEHALF OF PATENT OWNER HORIZON
PHARMA USA, INC.**

HORIZON'S EXHIBIT 2000

I, Susan Krumplitsch, declare as follows:

1. I am a litigation partner with the law firm Cooley LLP. Lead counsel in this *inter partes* review proceeding is Thomas A. Blinka, who is also a partner in the law firm Cooley LLP. Mr. Blinka is registered to practice before the United States Patent and Trademark Office and holds Registration No. 44,541. With respect to this proceeding, I will work closely with Mr. Blinka.

2. I hold a Juris Doctor degree from Northeastern University School of Law. I hold a Master of Science degree in immunology and infectious disease from Harvard University, and an undergraduate degree in psychology from the University of California, Los Angeles.

3. I have 13 years of experience as a practicing attorney and have been involved with several complex patent litigation proceedings.

4. In my capacity as a partner with Cooley LLP I have been intimately involved with litigation matters in various United States District Courts, United States Courts of Appeals, and before the International Trade Commission.

5. I am currently litigation counsel for Horizon in a pending federal district court action in which Petitioner asserts infringement of U.S. Patent No. 9,220,698, and I am familiar with the legal subject matter, technical subject matter, and prior art discussed in Petitioner's Request for *Inter Partes* Review of U.S. Patent No. 9,220,698.

6. In my capacity as a partner at Cooley LLP, I have become familiar with the legal subject matter, technical subject matter, and prior art involved with U.S. Patent No. 9,220,698.

7. I am therefore qualified to represent the interests of Horizon Pharma USA, Inc. as an experienced litigating attorney.

8. I have been admitted *pro hac vice* in docket numbers IPR2016-00458, IPR2016-00321, IPR2016-00319, and IPR2016-00316. I previously applied to appear *pro hac vice* in IPR2015-00802. The Board denied institution of *inter partes* review before ruling on that application. I have not applied to appear *pro hac vice* before the Office in any other proceeding in the last three (3) years.

9. I am a member in good standing of the State Bar of California. I am admitted to practice before the United States District Courts for the Northern District of California and the Central District of California and the United States Court of Appeals for the Federal Circuit.

10. I have never been suspended or disbarred from practice before any court or administrative body.

11. I have never had an application for admission to practice before any court or administrative body denied.

12. No sanction or contempt citation has been imposed against me by any court or administrative body.

13. I have read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in part 42 of 37 C.F.R.

14. 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).

15. I 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 were 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 and that such willful false statements may jeopardize the validity of U.S. Patent No. 9,220,698.

Date: January 12, 2018

BY: 
Susan Krumplitsch

CERTIFICATE OF SERVICE UNDER 37 C.F.R. § 42.6(e)

I, Thomas A. Blinka, hereby certify that on this 12th day of January, 2018, the foregoing **DECLARATION OF SUSAN KRUMPLITSCH IN SUPPORT OF MOTION TO APPEAR PRO HAC VICE ON BEHALF OF PATENT OWNER HORIZON PHARMA USA, INC.** was served electronically via email on the following:

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Date: January 12, 2018

By: /s/ Thomas A. Blinka
Thomas A. Blinka
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