

FLATWING PHARMACEUTICALS, LLC and MYLAN PHARMACEUTICALS, INC., Petitioners,

v.

ANACOR PHARMACEUTICALS, INC., Patent Owner.

Case No. IPR2018-00168¹ U.S. Patent No. 9,549,938

PETITIONERS' REPLY TO PATENT OWNER'S RESPONSE

¹ Case No. IPR2018-01358 has been joined with this proceeding.



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II.	Patent Owner's Experts Do Not Rebut Petitioner's Case					
	A.		Leider's Testimony Does Not Undercut Petitioner's Proof that emaining Claims Are Invalid			
		1.	Dr. Reider's Testimony Does Not Address the Proper Standard, of Whether a POSA Would Have Had A Reasonable Expectation of Success with 5%			
		2.	Dr. Reider Testified that Boron-Containing Compounds Ultimately Break Down In Water, But Fails To Consider Reaction Kinetics Showing How Long the Supposed Break Down Would Take			
		3.	Dr. Reider Also Repeats Previously Rejected Arguments About Boron's "Promiscuity" and "Keratin-Binding Affinity."			
	B.		ane's Testimony Does Not Undercut Petitioner's Proof that emaining Claims Are Invalid			
		1.	Dr. Lane Did Not Consider that Dose Ranging Studies Are A Routine Part Of Drug Development Which Would Lead A POSA To The 5% Solution Claimed			
		2.	Dr. Lane Continues To Rely on Theories the Board Has Already Rejected			



III.	Petitioner has proven by at least a preponderance of the evidence that a POSA would have a reasonable expectation of success at 5%			
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