

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DR. REDDY'S LABORATORIES INC.,

Petitioner v.

POZEN INC. and HORIZON PHARMA USA, INC.,

Patent Owners

U.S. Patent No. 9,220,698

Inter Partes Review No. Unassigned

**DECLARATION OF RICHARD BERGSTROM, PH.D.
IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW OF U.S.
PATENT NO. 9,220,698**

EXHIBIT 1003 – DECLARATION OF RICHARD BERGSTROM, PH.D.

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I, Richard Bergstrom, Ph.D., do hereby declare:

I. Introduction

1. My name is Richard Bergstrom. I have been retained by Dr. Reddy's Laboratories Inc. ("DRL") in the matter set forth in the caption above. I understand that DRL is petitioning for *inter partes* review ("IPR") of claims 1-7 of U.S. Patent No. 9,220,698 to Ault *et al.* ("the '698 patent") [Ex. 1001]. I submit this expert declaration in support of DRL's IPR petition for the '698 patent.

II. Qualifications and Background

A. Education and Experience

2. I am an expert in pharmacokinetics, which is frequently abbreviated as "PK." Pharmacokinetics is the branch of pharmacology that deals with the movement of a drug within the body of a living patient through the mechanisms of absorption, distribution, metabolism, and excretion. I am also an expert in pharmacodynamics, which is the study of a drug's pharmacological effect on the body. My background and qualifications are set forth in my curriculum vitae, which is attached to this declaration as Exhibit A and includes a complete list of my publications over the past ten years.

3. In brief, I received a Bachelor of Science degree in Pharmacy from the University of Pittsburgh in 1973, and a Master of Science degree from Butler University in 1977. I also received a Doctor of Philosophy degree in

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