

**UNITED STATES PATENT AND TRADEMARK OFFICE**

---

**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

---

DR. REDDY'S LABORATORIES S.A. AND  
DR. REDDY'S LABORATORIES, INC.  
Petitioners,

v.

INDIVIOR UK LIMITED,  
Patent Owner.

---

IPR2019-00329  
Patent 9,687,454

---

**PATENT OWNER'S SUR-REPLY TO PETITIONER'S REPLY**

In Indivior UK Limited’s (“Indivior”) Patent Owner Preliminary Response (Paper 12, “POPR”), Indivior explained that Dr. Reddy’s Laboratories S.A. and Dr. Reddy’s Laboratories, Inc. (“Petitioner” or “DRL”) failed to identify LTS Lohmann Therapy Systems, Corp. (“LTS”) as a real party in interest.

During the conference call on April 16, 2019, the Board asked DRL’s counsel whether DRL could simply file an updated mandatory notice identifying LTS as a real party in interest. DRL’s Reply fails to respond to the Board’s inquiry, and DRL has chosen not to identify LTS as a real party in interest. Instead, DRL argues that LTS is not a real party in interest. DRL’s argument relies on a conclusory declaration consisting primarily of four brief paragraphs (Ex. 1027, ¶¶ 7–10) that fail to refute any of the seven pages of testimony by the CEO of LTS about the importance of its preexisting business relationship with DRL (POPR, Paper 12, at 42–45; Ex. 2004). Indivior submits that on the record evidence, and under Federal Circuit authority, as argued in the POPR, the Board may find LTS to be a real party in interest, and proceed accordingly.

For the reasons set forth in Indivior’s POPR, the Board should deny institution of *inter partes* review of challenged claims 1–5 and 7–14 of U.S. Patent No. 9,687,454.

Date: May 2, 2019

Respectfully submitted,

By /Peter P. Chen /

David A. Garr

Registration No.: 74,932

Peter P. Chen

Registration No.: 39,631

COVINGTON & BURLING LLP

Attorneys for Patent Owner

## CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, I hereby certify that the foregoing Patent Owner's Sur-Reply was served by email, by agreement of the parties, on the following counsel of record for petitioner.

Ira J. Levy (ilevy@goodwinlaw.com)  
John Coy Stull (jstull@goodwinlaw.com)  
Robert Frederickson III (rfrederickson@goodwinlaw.com)  
GOODWIN PROCTER LLP  
DG-Suboxone@goodwinlaw.com

Date: May 2, 2019

/Peter P. Chen /  
Peter P. Chen  
Registration No.: 39,631