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**Subject:** Sandoz Inc. v. Pharmacyclics LLC, IPR2019-00865  
**Date:** Tuesday, May 12, 2020 3:00:03 PM

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Sandoz Inc. v. Pharmacyclics LLC  
IPR2019-00865

Dear Honorable Board,

Patent Owner seeks authorization to file a motion to strike improper new arguments included in Petitioner's Reply Brief pursuant to 37 C.F.R. § 42.23(b) as the Board has previously authorized. *E.g.*, *Qiagen North American Holdings, Inc. v. Handylab, Inc.*, IPR2019-0488, Paper 37 at 2 (PTAB Feb. 13, 2020). Specifically, Patent Owner seeks to strike the following two new arguments:

1. Section III.B of the Reply argues for the first time that the '085 Publication explicitly discloses the steroid-dependent/refractory patient subpopulations claimed in claims 4, 13, and 15 (and claims depending therefrom); and
2. Section III.C.1 of the Reply argues for the first time that the '085 Publication explicitly discloses the patient treatment outcomes of claims 6-8, 29-31, 44-46, and 51-53.

Petitioner opposes. If the Board believes a teleconference would be helpful, Patent Owner and Petitioner are available between 1-4 PM on Thursday, May 14 and Friday, May 15.

Respectfully,

Erin M. Sommers  
Back-up Counsel for Patent Owner  
Reg. No. 60,974

**Erin M. Sommers**

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