

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED THERAPEUTICS
CORPORATION,

Plaintiff,

v.

LIQUIDIA TECHNOLOGIES, INC.,

Defendant.

C.A. No. 1:20-cv-00755-RGA



EXPERT REPORT OF DR. IGOR GONDA

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I. INTRODUCTION

1. My name is Igor Gonda and I have been retained by Liquidia Technologies Inc. (“Liquidia”) as an expert in *United Therapeutics Corporation v. Liquidia Technologies Inc.*, Case No. 1:20-cv-00755-RGA in the District of Delaware.

2. I reserve the right to prepare exhibits to summarize and demonstrate my testimony at trial.

3. I have not testified as an expert in the past 4 years.

4. I was paid my customary rate of \$850 per hour for my study of this matter and for any time I might spend testifying. My compensation is in no way dependent on the outcome of the case.

II. MATERIALS CONSIDERED

5. In forming my opinions, I have considered the materials specifically cited in my report as well as the documents identified in **Attachment B**.¹

III. BACKGROUND AND QUALIFICATIONS

6. I am currently the founder and CEO of Respidex LLC, which has offered consulting services to pharmaceutical and medical device companies since 2018. Before founding Respidex LLC, I held leadership positions at several pharmaceutical companies, including Aradigm Corporation, a company that focused on developing inhalation therapies for the prevention and treatment of serious respiratory and systemic diseases.

7. In 1971, I received my Bachelor of Science in Chemistry from the University of Leeds. In 1974, I received my Ph.D. in Physical Chemistry from the University of Leeds. After

¹ I understand that counsel for UTC has not yet permitted Liquidia to take the deposition of Dr. Robert Roscigno, a named inventor on the '793 patent, and also a corporate deposition concerning the conception and reduction to practice of the invention claimed in the '793 patent. I reserve the right to supplement my expert reports, if needed, to consider this information.

129.

[REDACTED]

XI. THE ASSERTED '793 PATENT CLAIMS ARE NOT ENABLED

A. The Specification of the '793 Patent Does Not Enable a Powder Formulation of Treprostnil or its Salt

130. To the extent UTC contends that the asserted claims of the '793 Patent are not obvious, it is my opinion that the '793 Patent specification does not teach a POSA how to formulate a treprostnil (or a pharmaceutically acceptable salt of treprostnil) powder formulation suitable for

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