IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

UNITED THERAPEUTICS CORPORATION,

Plaintiff,

v.

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

LIQUIDIA TECHNOLOGIES, INC.,

Defendant.

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.





XI. THE ASSERTED '793 PATENT CLAIMS ARE NOT ENABLED

- A. The Specification of the '793 Patent Does Not Enable a Powder Formulation of Treprostinil 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 treprostinil (or a pharmaceutically acceptable salt of treprostinil) powder formulation suitable for



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