

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

REGENERON PHARMACEUTICALS, INC.

Petitioner,

v.

NOVARTIS PHARMA AG,
NOVARTIS TECHNOLOGY LLC,
NOVARTIS PHARMACEUTICALS CORPORATION,

Patent Owners.

Patent Number: 9,220,631

DECLARATION OF LISA J. CAMERON, Ph.D.

CONTENTS

I.	Introduction.....	4
A.	Qualifications.....	4
B.	Assignment.....	5
II.	Summary of Findings	8
III.	Background	18
A.	Angiogenic Eye Diseases and Anti-VEGF Treatments	18
1.	Lucentis	24
2.	Eylea.....	25
3.	Other Treatments.....	30
B.	The '631 Patent.....	36
IV.	Applicable Patent Legal Standards	37
A.	Secondary Considerations of Non-Obviousness.....	38
B.	Nexus of Secondary Considerations	38
V.	Mr. Malackowski Fails to Demonstrate the Commercial Success (If Any) Achieved by the PFS Form of Lucentis	40
VI.	Mr. Malackowski Fails to Demonstrate the Existence of a Nexus Between the '631 Patent and the Alleged Commercial Success of the Lucentis PFS.....	42
VII.	Mr. Malackowski's Analysis Does Not Demonstrate the Existence of a Nexus Between the PFS Form of Lucentis and Any Commercial Success	45
1.	Internal Novartis Models.....	48
2.	U.S. Lucentis Sales.....	53
3.	Ex-U.S. Lucentis Sales.....	59
VIII.	Mr. Malackowski's Licensing Analysis Does Not Support a Finding of Non-Obviousness with Respect to the Patented Claims.....	60
A.	[REDACTED].....	[REDACTED]
	[REDACTED].....	[REDACTED]
	[REDACTED].....	61

B. Bayer’s Sub-License with Vetter Does Not Provide Evidence of Commercial Success or Commercial Acquiescence with Respect to the ‘631 Patent72

IX. Conclusion77

I. INTRODUCTION

A. QUALIFICATIONS

1. My name is Dr. Lisa Cameron. I am a Principal in the Boston office of The Brattle Group, an economic consulting firm that provides consulting services to firms and governments. My professional career has spanned more than 25 years. I have broad experience in intellectual property, false advertising, competition, and transfer pricing matters and have analyzed commercial success, licensing issues, damages, liability, and requests for injunctive relief. My industry expertise includes pharmaceuticals, biologics, medical devices, motor vehicles, consumer products, software, e-commerce, cryptocurrencies, telecommunications, and energy.

2. I regularly present on matters involving intellectual property issues and have published in leading academic and professional journals, including the *American Economic Review*. I have also previously testified on damages and commercial success in pharmaceutical industry patent disputes in U.S. Federal Court and on competition and investment incentives before the U.S. Federal Energy Regulatory Commission and U.S. state public utility commissions.

3. Prior to becoming an economic consultant, I was a professor of economics in Carnegie Mellon University's Graduate School of Business, where I

taught courses in microeconomic theory, regulation, and antitrust policy. I received my Ph.D. in Economics from Stanford University and my B.Sc. in Business and Applied Economics from Cornell University. Exhibit 1170 provides my CV, which lists my publications, testifying experience, and selected presentations.

B. ASSIGNMENT

4. I have been retained by counsel for Regeneron Pharmaceuticals, Inc. (“Regeneron”; also “Petitioner”) in the above-captioned *inter partes* review of U.S. Patent No. 9,220,631 (“the ’631 Patent”) allegedly owned by Novartis Pharma AG, Novartis Technology LLC, and Novartis Pharmaceuticals Corporation (collectively, “Novartis”; also “Patent Owner”). I understand that the ’631 Patent relates to “a terminally sterilized, pre-filled glass syringe for intravitreal injection that includes a VEGF-antagonist solution.”¹ In the present matter, Regeneron alleges that the claims of the ’631 Patent are obvious and, as such, has requested

¹ Paper No. 1, Petition for Inter Partes Review of U.S. Patent No. 9,220,631, Regeneron Pharmaceuticals, Inc. v. Novartis Pharma AG, Novartis Technology LLC, and Novartis Pharmaceuticals Corporation, April 16, 2021 (“Paper No. 1”), p. 1.

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