

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MYLAN PHARMACEUTICALS INC.,
MSN LABORATORIES PRIVATE LTD.,
and MSN PHARMACEUTICALS INC.,

Petitioner,

v.

BAUSCH HEALTH IRELAND LIMITED,

Patent Owner.

Case IPR2022-00722¹
U.S. Patent No. 7,041,786

**PATENT OWNER'S REPLY TO PETITIONER'S OPPOSITION TO
PATENT OWNER'S MOTION TO SEAL**

¹ IPR2023-00016 has been joined with this proceeding.

Patent Owner disagrees with Petitioner's assertions that Patent Owner seeks to seal materials that are not confidential. While certain information from Exhibits 2027 and 2028 is summarized in documents available on the FDA's website (Ex. 1069) or in the file history of EP 02721604.3 (Ex. 1067), those documents do not contain any pages of Exhibits 2027 and 2028 or all of the underlying data disclosed therein. *See, e.g.*, Ex. 2027, 20-21; Ex. 2028, 14. Nevertheless, in an effort to simplify the issues, Patent Owner is at this point in time willing to make Exhibits 2027 and 2028 public as well as the papers and exhibits that cite to Exhibits 2027 and 2028, i.e., Paper Nos. 27, 38, 49, 54, and 56 and Exhibits 1060, 1063, 1064, 2023, 2024, and 2025.

Respectfully submitted,

Date: May 31, 2023

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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing **Patent Owner's Reply to Petitioner's Opposition to Patent Owner's Motion to Seal** was served electronically via email on May 31, 2023, to counsel of record for the Petitioner at the following:

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