

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MSN LABORATORIES PRIVATE LTD. AND MSN PHARMACEUTICALS INC.
Petitioners

v.

BAUSCH HEALTH IRELAND LIMITED,
Patent Owner

IPR2023-00016
Patent No. 7,041,786

**DECLARATION OF CHRISTOPHER J. SORENSON IN SUPPORT OF
PETITIONERS' MOTION FOR ADMISSION *PRO HAC VICE***

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In support of the Motion for Admission *Pro Hac Vice*, I, Christopher J. Sorenson, do declare and state as follows:

1. I am a member in good standing of the Minnesota State Bar, the United States District Court for the District of Minnesota, District of Southern Iowa, Court of Appeals Eighth Circuit, and Court of Appeals Federal Circuit.
2. I have no suspensions or disbarments from practice before any court or administrative body.
3. I have never had any court or administrative body deny my application to practice before said court or administrative body.
4. I have never been sanctioned or cited for contempt by any court or administrative body.
5. I have read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in 37 C.F.R § 42.
6. I will be subject to the USPTO Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 *et. seq.* and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).
7. I have previously applied to appear *pro hac vice* before the USPTO in proceeding Nos. IPR2014-00592, IPR2017-01598, IPR2017-01599, and IPR2017-01603. Said applications were granted.

8. I am a partner in the law firm of Merchant & Gould P.C. I have practiced litigation for more than twenty-six (26) years. I have represented a wide range of clients in intellectual property and have been litigating patent cases for the last twenty-one (21) years.

9. I am counsel for Defendants in the case *Bausch Health Ireland Limited and Salix Pharmaceuticals, Inc. v. MSN Laboratories Private Ltd. and MSN Pharmaceuticals Inc.*, U.S.D.C., New Jersey, Civil Action No. 21-10057, which involves U.S. Patent No. 7,041,786.


10. I am familiar with the subject matter of this case, which relates to U.S. Patent No. 7,041,786 and its claims regarding the therapeutic use of guanylate cyclase receptor agonists as a means for enhancing the intracellular production of cGMP and I was involved in the preparation of the Motion for Joinder Pursuant to 35 U.S.C. § 315(c) and 37 C.F.R. § 42.122(b) and the Petition. I have worked extensively analyzing the invalidity positions, including those based on the same references raised in the Petition and advanced by Petitioners MSN Laboratories Private Ltd and MSN Pharmaceuticals Inc. I am thus familiar with the prior art relied upon in the Petitioners' Petition as well as the patent at issue.

I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true, and further that these statements were made with the knowledge that willful false

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statements and the like so made are punishable by fine or imprisonment, or both,
under Section 1001 of Title 18 of the United States Code.

Dated: November 2, 2022


/s/ Christopher J. Sorenson /s/

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