

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HOPEWELL PHARMA VENTURES, INC.,

Petitioner,

v.

MERCK SERONO S.A.,

Patent Owner.

Case IPR2023-00480
U.S. Patent No. 7,713,947

**DECLARATION OF NANCY E. ADAMS Ed.D.
IN SUPPORT OF PETITION FOR INTER PARTES REVIEW OF U.S.
PATENT NO. 7,713,947**

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Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

*Inter Partes Review of U.S. Patent No. 7,713,947
Declaration of Nancy E. Adams Ed.D.*

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*Inter Partes Review of U.S. Patent No. 7,713,947
Declaration of Nancy E. Adams Ed.D.*

I. INTRODUCTION

I, Nancy E. Adams Ed.D., do hereby declare as follows:

1. I have been retained as an independent expert witness on behalf of Hopewell Pharma Ventures, Inc. for proceedings before the United States Patent and Trademark Office (“PTO”) regarding the authenticity and public availability of certain prior-art references in relation to U.S. Patent No. 7,713,947.

2. I am being compensated for my work in this matter at my customary hourly rate, which is \$250/hour. I am also reimbursed for any reasonable expenses associated with my work on this matter. My compensation is not contingent on the results of my study, the substance of my opinions, or the outcome of this matter.

3. I understand that this Declaration accompanies a petition for an Inter Partes Review (IPR) involving U.S. Patent No. 7,713,947 (“the ’947 patent”) (EX1001), which resulted from U.S. Patent Application No. 11/722,018 (“the ’018 application”), filed on June 18, 2007. I understand that the ’947 patent alleges a priority date of December 22, 2004. I refer to this date throughout this declaration.

A. Qualifications and Professional Experience

4. My complete qualifications and professional experience are described in my curriculum vitae (EX1030). The following is a brief summary of my relevant qualifications and professional experience.

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5. I am the Assistant Dean of Foundational Sciences at Penn State College of Medicine and Librarian for Education and Instruction at Harrell Health Sciences Library. I have held this combined position since July of 2017; before that, I held the position Associate Director of the Harrell Health Sciences Library, which began 2010. Before that, I held numerous Librarian positions at the University level, such as Harrisburg University of Science and Technology, The University of Maine, and Wayne State University. I have accumulated a total of 26 years of experience working in an academic library and medical library. I hold an Ed.D. in Adult Education from Pennsylvania State University and a Masters in Library and Information Science from Wayne State University.

6. I am an expert on library cataloging, classification, and searching. I have published contributed chapters to editions on this subject, *Curriculum Mapping: A Match Made for Librarian Skill*, and *Making it better: library and student services collaboration at a new university* (2020 and 2012). I have taught workshops on literature searching to a myriad of college students, physicians, and medical students for decades. I have given presentations, such as “Searching PubMed like an Expert: The Evolution, a PubMed Searching Discussion Forum.” I have served as the search specialist on a systematic review team in which my role was to formulate, execute, and document an exhaustive search of the literature answering a specific research question.

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7. I am familiar with metadata schema design and implementation. As a librarian, I routinely use the metadata associated with publications to answer reference questions or track down items that researchers need. I have used online cataloging systems to create new catalog records for items held by libraries.

8. I am personally familiar with many online catalogs, databases, and search engines, including all of the particular catalogs, databases, and search engines that I relied upon in forming my opinions. In preparing for this Declaration, I used the following authoritative information system to search for records:

- Google Scholar (<http://scholar.google.com>)

B. Scope of This Declaration

9. I have been asked to offer an opinion on the authenticity and public-availability date of the following document:

- Stelmasiak, Z., Solski, J., Nowicki, J., Porebska-Piwowarczyk, E., Jakubowksa, B., Ryba, M., and Grieb, P., (1998, Jan 1), "A pilot trial of cladribine (2-chlorodeoxyadenosine) in remitting-relapsing multiple sclerosis," *Medical Science Monitor*, vol. 4, no. 1, pp. 4-8 (EX1013, "Stelmasiak").

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