

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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SAMSUNG BIOEPIS CO., LTD., CELLTRION INC,  
and BIOCON BIOLOGICS INC.  
Petitioner,

v.

REGENERON PHARMACEUTICALS, INC.,  
Patent Owner.

Patent No. 11,253,572

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*Inter Partes* Review No. IPR2023-00884<sup>1</sup>

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**DECLARATION OF JEFFREY SPADA**

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<sup>1</sup> IPR2024-00260 and IPR2024-00298 are joined with IPR2023-00884.

I, Jeffrey Spada, declare as follows:

1. I am Associate Director, eDiscovery and Litigation Support at Regeneron Pharmaceuticals, Inc. I have personal knowledge of the facts in this declaration.

2. Regeneron has collected documents as part of the ongoing related litigation. The collected documents are stored in a KLDISCOVERY database and can be accessed through the KLDISCOVERY's Relativity interface. The document collection process preserves these documents' metadata, such as the file names, dates, etc. The identity of the document custodian, meaning the person from whose files a document was collected, is also preserved. When emails are collected, information about email and attachment relationships is preserved. The collected document and its metadata and other preserved information are accessible via the Relativity interface.

3. Exhibit 2092 is a collection of screenshots from the Relativity interface. These screenshots show the metadata and other information for the following exhibits: 2005, 2006, 2010, 2011, 2013, 2015, 2017–2019, 2024, 2036, 2042, 2043, and 2069–2074. I have verified that these screenshots are true and correct depictions of the information in Relativity corresponding to each exhibit.

4. Pages 1 and 2 of Exhibit 2092 are Relativity screenshots showing the metadata and attachment information for Exhibits 2005 and 2006, respectively.

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Exhibit 2005 is an email sent by George Yancopoulos to Murray Goldberg on March 22, 2007. The email included an attachment with the file name “Eye Ph2 Data\_032207.doc.” The email was assigned the family ID number 6239292\_02449774 in the Relativity database. Exhibit 2006 is a document with the file name “Eye Ph2 Data\_032207.doc” that was assigned the same family ID number 6239292\_02449774 in the Relativity database. This shows Exhibit 2006 was sent as an attachment to Exhibit 2005.

5. Pages 3 and 4 of Exhibit 2092 are screenshots from the Relativity interface showing the metadata for Exhibits 2010 and 2011, respectively. Exhibit 2010 is an email sent by Robert Terifay to George Yancopoulos on November 19, 2010. The email included an attachment with the file name “VGTeye VIEW 430 presentation.PPT.” The email was assigned the family ID number 6239292\_02293467 in the Relativity database. Exhibit 2011 is a document with the file name “VGTeye VIEW 430 presentation.PPT” that was assigned the same family ID number 6239292\_02293467 in the Relativity database. This shows Exhibit 2011 was sent as an attachment to Exhibit 2010.

6. Page 5 of Exhibit 2092 is a screenshot from the Relativity interface showing the metadata for Exhibit 2013. Exhibit 2013 was sent as an email attachment on May 20, 2008. George Yancopoulos is the custodian for this document.

7. Pages 6 and 10 of Exhibit 2092 are screenshots from the Relativity interface showing the metadata for Exhibits 2015 and 2024, respectively. Exhibit 2024 is an email sent by Caroline Saxton to George Yancopoulos and other Regeneron employees on December 8, 2010. The email included an attachment with the file name “DA VINCI 1 year final draft.pdf.” The email was assigned the family ID number 6239292\_02301952 in the Relativity database. Exhibit 2015 is a document with the file name “DA VINCI 1 year final draft.pdf” that was assigned the same family ID number 6239292\_02301952 in the Relativity database. This shows Exhibit 2015 was sent as an attachment to Exhibit 2024.

8. Pages 7 to 9 of Exhibit 2092 are screenshots from the Relativity interface showing the metadata for Exhibits 2017, 2018, and 2019, respectively. Exhibit 2017 is an email sent by Caroline Saxton to George Yancopoulos and other Regeneron employees on February 1, 2010. The email included attachments with the file names “VGFT-OD-0706 KRM v3.doc” and “DME 6 month data 020110.ppt.” The email was assigned the family ID number 6239292\_03173151 in the Relativity database. Exhibits 2018 and 2019 are documents with the file names “VGFT-OD-0706 KRM v3.doc” and “DME 6 month data 020110.ppt,” respectively, that were assigned the same family ID number 6239292\_03173151 in the Relativity database. This shows Exhibits 2018 and 2019 were sent as attachments to Exhibit 2017.

9. Page 11 of Exhibit 2092 is a screenshot from the Relativity interface showing the metadata for Exhibit 2036. Exhibit 2036 was sent as an email attachment on September 26, 2007. George Yancopoulos is the custodian for this document.

10. Pages 12 and 13 of Exhibit 2092 are screenshots from the Relativity interface showing true and correct metadata for Exhibits 2042 and 2043, respectively. Exhibit 2042 is an email sent by Yuhwen Soo to George Yancopoulos on November 20, 2010. The email included an attachment with the file name "Combined Analysis.PPT." The email was assigned the family ID number 6239292\_02301450 in the Relativity database. Exhibit 2043 is a document with the file name "Combined Analysis.PPT" that was assigned the same family ID number 6239292\_02301450 in the Relativity database. This shows Exhibit 2043 was sent as an attachment to Exhibit 2042.

11. Page 14 of Exhibit 2092 is a screenshot from the Relativity interface showing the metadata for Exhibit 2069. Exhibit 2069 was sent as an email attachment on November 8, 2006. George Yancopoulos is the custodian for this document.

12. Pages 15 and 16 of Exhibit 2092 are screenshots from the Relativity interface showing the metadata for Exhibit 2070. Exhibit 2070 is an email sent by Robert Terifay to George Yancopoulos and other Regeneron employees on March

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