

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

REGENERON PHARMACEUTICALS, INC.,
Patent Owner.

Patent No. 11,253,572

Inter Partes Review No. IPR2023-00884¹

**MOTION TO FILE CONFIDENTIAL DOCUMENTS UNDER
SEAL PURSUANT TO 37 C.F.R. §§ 42.14 AND 42.54**

¹ IPR2024-00260 and IPR2024-00298 are joined with IPR2023-00884.

Pursuant to 35 U.S.C. § 316(a)(1) and 37 C.F.R. §§ 42.14 and 42.54, Patent Owner Regeneron Pharmaceuticals, Inc. moves to seal the following exhibits and references to confidential information within these exhibits and in the Patent Owner's Response:

Exhibit	Description
2063	Declaration of George Yancopoulos
2064	Declaration of Karen Chu
2067	Expert Declaration of Richard Manning, PhD and Attachments C-1 through Y-4
2069	Regeneron, "Bayer Alliance Internal Kick-Off Meeting," 11/2006
2070	Regeneron, Email from Terifay to Yancopoulos et. al, 3/22/2007 with attached slides
2072	Regeneron, CLEAR-IT-2 results, sent by Powchik to Yancopoulos 3/22/2007
2073	Regeneron, CLEAR-IT-2 results and analysis, sent by Yancopoulos to Schleifer 3/22/2007
2075	Regeneron, Email from Yancopoulos to Jody, 4/2007
2076	Regeneron, VIEW Protocol, 5/2007
2092	Metadata Exhibit
2141	American Society of Retina Specialists, "2015 Preferences and Trends (PAT) Survey," c. 2015
2142	American Society of Retina Specialists, "2016 Preferences and Trends (PAT) Survey," c. 2016
2143	Regeneron, "DME Market Assessment," 8/2014
2144	Regeneron, "Q2 2020 Performance Update Wet AMD, DME, MEfRVO & DR w/out DME," 7/2020
2147	American Society of Retina Specialists, "2009 Preferences and Trends Membership Survey," c. 2009
2162	Regeneron, "DME Market Assessment Q1 2015," 4/2015

Exhibit	Description
2163	Regeneron, "DME Market Assessment Q1 2016," 4/2016
2164	Regeneron, "DME Market Assessment Q1 2017," 5/2017
2165	Regeneron, "DME Market Assessment Q1 2018," 5/2018
2166	Regeneron, "DME Market Assessment Q2 2015," 8/2015
2167	Regeneron, "DME Market Assessment Q2 2016," 8/2016
2168	Regeneron, "DME Market Assessment Q2 2017," 7/2017
2169	Regeneron, "DME Market Assessment Q2 2018," 7/2018
2170	Regeneron, "DME Market Assessment Q3 2015," 11/2015
2171	Regeneron, "DME Market Assessment Q3 2016," 10/2016
2172	Regeneron, "DME Market Assessment Q3 2017," 10/2017
2173	Regeneron, "DME Market Assessment Q4 2014," 1/2015
2174	Regeneron, "DME Market Assessment Q4 2015," 2/2016
2175	Regeneron, "DME Market Assessment Q4 2016," 1/2017
2176	Regeneron, "DME Market Assessment Q4 2017," 2/2018
2177	Regeneron, "DME Market Assessment Wave 3, Q3 2014
2178	Regeneron, "DME Market Assessment, Benchmark Wave," 11/8/2013
2179	Regeneron, "Physician ATU: Q1 2015," 4/2015
2180	Regeneron, "Physician ATU: Q2 2015," 7/2015
2181	Regeneron, "Physician ATU: Q3 2014," 11/2014

Exhibit	Description
2182	Regeneron, "Physician ATU: Q3 2015," 11/2015
2183	Regeneron, "Physician ATU: Q4 2014," 1/2015
2184	Regeneron, "Physician ATU: Q4 2015," 1/2016
2185	Regeneron, "Physician ATU: Wave 2," 2/2013
2186	Regeneron, "Physician ATU: Wave 4," 8/6/2013
2187	Regeneron, "Physician ATU: Wave 5," 11/2013
2188	Regeneron, "Physician ATU: Wave 6," 1/2014
2189	Regeneron, "Physician ATU: Wave 7," 4/2014
2190	Regeneron, "Physician ATU: Wave 8," 8/2014
2191	Regeneron, "Q1 2019 Performance Update Wet AMD, DME, & MEfRVO," 5/2019
2192	Regeneron, "Q1 2020 Performance Update Wet AMD, DME, MEfRVO & DR w/out DME," 4/2020
2193	Regeneron, "Q2 2019 Performance Update Wet AMD, DME, MEfRVO & DR w/out DME," 8/2019
2194	Regeneron, "Q3 2018 Performance Update Wet AMD, DME, & MEfRVO," 11/2018
2195	Regeneron, "Q3 2019 Performance Update Wet AMD, DME, MEfRVO & DR w/out DME," 11/2019
2196	Regeneron, "Q3 2020 Performance Update Wet AMD, DME, MEfRVO & DR w/out DME," 11/2020
2197	Regeneron, "Q4 2018 Performance Update Wet AMD, DME, & MEfRVO," 2/2019
2198	Regeneron, "Q4 2019 Performance Update Wet AMD, DME, & MEfRVO," 1/2020
2199	Regeneron, "Q4 2020 Performance Update Wet AMD, DME, MEfRVO & DR w/out DME," 1/29/2021
2214	Regeneron, "US Eylea P&L LTD," 12/2021

Exhibit	Description
2215	Regeneron, "Wet AMD Physician ATU: Q1 2016," 4/2016
2216	Regeneron, "Wet AMD Physician ATU: Q1 2017," 4/2017
2217	Regeneron, "Wet AMD Physician ATU: Q1 2018," 5/2018
2218	Regeneron, "Wet AMD Physician ATU: Q2 2016," 8/2016
2219	Regeneron, "Wet AMD Physician ATU: Q2 2017," 7/2017
2220	Regeneron, "Wet AMD Physician ATU: Q2 2018," 7/2018
2221	Regeneron, "Wet AMD Physician ATU: Q3 2016," 10/2016
2222	Regeneron, "Wet AMD Physician ATU: Q3 2017," 10/2017
2223	Regeneron, "Wet AMD Physician ATU: Q4 2016," 1/2016
2224	Regeneron, "Wet AMD Physician ATU: Q4 2017," 1/2018
2225	Regeneron, "Wave 1 2021 Performance Update Wet AMD, DME, MEfRVO, and DR w/out DME," 9/2021
2232	Regeneron, Eylea Gross & Net Sales P&L YTD, c.2021
2238	Vestrum, Anti-VEGF Category Sales Shares, c. 2/2022

I. DOCUMENTS TO BE SEALED AND REASONS FOR SEALING

The standard governing the Board's determination of whether to grant a motion to seal is "good cause." *Arctic Cat, Inc. v. Polaris Indus. Inc.*, No. IPR2017-00433, 2018 WL 1145910, at *1 (P.T.A.B. Feb. 27, 2018) (quoting 37 C.F.R. § 42.54). "The moving party bears the burden of showing that the relief requested should be granted, and establishing that information sought to be sealed

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.