

IPR2024-00009
U.S. Patent 10,335,462

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DR. REDDY'S LABORATORIES, INC. AND DR. REDDY'S
LABRATORIES LTD,
Petitioners

v.

NOVO NORDISK A/S,
Patent Owner

Case IPR2024-00009
Patent 10,335,462

**JOINT STIPULATION REGARDING PETITIONERS'
MOTION FOR JOINDER**

Pursuant to the Board's Order on November 8, 2023 (Paper 11), Patent Owner Novo Nordisk A/S ("Novo") and Petitioners Dr. Reddy's Laboratories, Inc. and Dr. Reddy's Laboratories Ltd. (collectively "Dr. Reddy's") submit the following stipulation regarding Dr. Reddy's Motion for Joinder (Paper 3) in lieu of Novo filing an opposition to that motion. Novo intends to file a Patent Owner Preliminary Response, and Novo's agreement not to oppose joinder is contingent on institution of this proceeding, which Novo opposes.

Regarding joinder, the parties have agreed as follows:

- In the event Dr. Reddy's Petition is instituted, only Dr. Reddy's will be joined to *Mylan Pharmaceuticals, Inc. v. Novo Nordisk, A/S*, IPR2023-00724 ("the Mylan IPR"). Dr. Reddy's Petition and related papers will not be joined or added as part of institution.
- In the event (1) Dr. Reddy's Petition is instituted, (2) Dr. Reddy's is joined to the Mylan IPR, and (3) Mylan is terminated before Novo has had the opportunity to depose an expert for which Mylan filed a corresponding expert declaration (and within the time period for the taking the corresponding deposition), the parties will meet and confer as to (1) depositions, (2) whether any substitute expert(s) will be needed and/or deposed on the already-filed expert declaration(s) or whether the expert declaration(s) themselves will be expunged and

replaced by the declaration(s) filed with the copycat petition, and (3) what sort of adjustment to the schedule, if any, is needed. Having met and conferred, the parties will then request a call with the Board regarding these issues.

- Unless Mylan is terminated, Dr. Reddy's will serve in the silent understudy role. In the event that both (1) Dr. Reddy's Petition is instituted and Dr. Reddy is joined to the Mylan IPR and (2) *Sun Pharmaceutical Industries Ltd. v. Novo Nordisk, A/S*, IPR2024-00107 ("the Sun IPR") is instituted and the Sun IPR Petitioners are joined to the Mylan IPR, only one of the joined Petitioners should take the lead role, and the other should assume the understudy role.
- Dr. Reddy's shall not be permitted to raise any new grounds not instituted by the Board in the Mylan IPR, or introduce any argument not already introduced by Mylan.
- With regard to the taking of testimony, Dr. Reddy's will abide by 37 C.F.R. §42.53 and any agreement between the Patent Owner and Mylan.

Respectfully submitted,

By: /Megan Raymond/

Dated: November 20, 2023

J. Steven Baughman (Reg. No. 47,414)

GROOMBRIDGE, WU, BAUGHMAN & STONE LLP
801 17th Street, NW, Suite 1050
Washington, DC, 20006
P: (202)-505-5832
steve.baughman@groombridgewu.com

Megan Raymond (Reg. No. 72,997)
GROOMBRIDGE, WU, BAUGHMAN & STONE LLP
801 17th Street, NW, Suite 1050
Washington, DC, 20006
P: (202)-505-5878
megan.raymond@groombridgewu.com

Attorneys for Patent Owner Novo Nordisk A/S

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of JOINT STIPULATION REGARDING PETITIONERS' MOTION FOR JOINDER has been served in its entirety on November 20, 2023, by causing the aforementioned document to be electronically mailed to the following attorneys of record for the Petitioner listed below.

Petitioner's Counsel of Record:

Lead Counsel:	Jovial Wong Reg. No. 60,115 Winston & Strawn LLP 1901 L Street NW Washington, DC 20036 Telephone: (202) 282-5867 jwong@winston.com By Electronic Mail
Backup Counsel:	Scott Border Reg. No. 77,744 Winston & Strawn LLP 1901 L Street NW Washington, DC 20036 Telephone: (202) 285-5054 sborder@winston.com Sharon Lin McIntosh (<i>pro hac vice</i> to be submitted) Winston & Strawn LLP 1901 L Street NW Washington, DC 20036 Telephone: (202) 285-5756 slin@winston.com By Electronic Mail

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.