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Transcript of Conference Call

Date: July 3, 2023

Case: Synaffix B.V. -v- Hangzhou DAC Biotech Co., Ltd.

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WORLDWIDE COURT REPORTING & LITIGATION TECHNOLOGY

EX1058
SYNAFFIX B.V.
IPR2022-01531

Transcript of Conference Call
Conducted on July 3, 2023

1 (1 to 4)

1 IN THE MATTER OF: 2 -----X 3 SYNAFFIX B.V. : IPR 2022-01531 4 : 5 vs. : Patent No. 10,131,682 6 : 7 HANGZHOU DAC BIOTECH CO., : 8 LTD. : 9 -----X 10 11 12 13 CONFERENCE CALL 14 BEFORE JUDGE NEWMAN AND JUDGE YANG 15 HOUSTON, TEXAS 16 MONDAY, JULY 3, 2023 17 18 (Reported Remotely) 19 20 21 22 23 REPORTED BY: TANYA L. VERHOVEN-PAGE, 24 CCR-B-1790 25 FILE NO. 498959	1 APPEARANCES OF COUNSEL 2 3 On behalf of the Petitioner: 4 FOLEY & LARDNER, LLP 5 321 North Clark Street 6 Suite 3000 7 Chicago, Illinois 60654-5313 8 (312) 832-4500 9 BY: MICHAEL R. HOUSTON, ESQ. 10 e-mail: mhouston@foley.com 11 (Via Zoom) 12 13 FOLEY & LARDNER, LLP 14 50 East Gilman Street 15 Suite 5000 16 Madison, Wisconsin 53703 17 (608) 257-5035 18 BY: JOSEPH P. MEARA, ESQ. 19 e-mail: jmeara@foley.com 20 (Via Zoom) 21 22 On behalf of the Patent Owner: 23 QUINN, EMANUEL, URQUHART & SULLIVAN, LLP 24 51 Madison Avenue 25 22nd Floor New York, New York 10010 (212) 849-7000 BY: CATHERINE T. MATTES, ESQ. e-mail: catherinemattes@quinnemanuel.com BY: FRANK C. CALVOSA, ESQ. e-mail: frankcalvosa@quinnemanuel.com (Via Zoom) ALSO PRESENT: Adam Burnstein (Summer Associate) - - -
1 July 3, 2023 2 1:34 p.m. EST 3 4 Conference call held in Houston, 5 Texas before Tanya L. Verhoven-Page, 6 Certified Court Reporter (GA), Licensed Court 7 Reporter (TN) and Certified Shorthand 8 Reporter (TX). 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	1 HOUSTON, TEXAS; MONDAY, JULY 3, 2023 2 1:34 P.M. 3 4 P R O C E E D I N G S 5 6 THE COURT: We are here in the 7 matter of IPR 2022-01531, and petitioner 8 has requested this conference call for 9 the purpose of seeking authorization to 10 file a preliminary reply on two topics. 11 And the first topic being 325(d), and the 12 second topic being patent owner's -- 13 characterized as newly proposed claim 14 construction, before terms. I'm not sure 15 why the term newly proposed is there 16 because this is the patent owner's 17 response. And then patent owner's 18 non-analogous argument as it relates to 19 the claim construction position. 20 Let me just start by saying that we 21 are well into our writing period here at 22 the Board, and five weeks after the 23 patent owner responds is not an ideal 24 time to ask for additional briefing of 25 this scope and of this length, in that I

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5 1 partially set aside the 325(d) 2 consideration because in some instances 3 there are 325(d) arguments that do have 4 good cause. 5 So, from petitioner, I would like 6 to hear why it is, in particular for 2 7 and 3, as requested, the claim 8 constructions and their impact to the 9 claim construction positions, why there's 10 good cause at this stage in the briefing 11 and in general to your good cause 12 arguments. 13 And then when patent owner 14 responds, responding on those good cause 15 points, as well. 16 Any questions before we begin? 17 MR. HOUSTON: Your Honor, I just 18 want to clarify. So it sounds -- if I 19 heard you correctly, you don't want to 20 hear argument today on 325(d) issues. 21 You want to focus on the claim 22 construction and analogous art topics 23 that were listed in the e-mail; is that 24 correct? 25 THE COURT: I may have spoken a	7 1 wasn't clear who was going to be 2 controlling the proceedings going 3 forward. 4 And, in fact, we are still working 5 on some answers for that, but we anticipate 6 very likely filing updated mandatory 7 disclosures to report that development as 8 soon as we've clarified with our client, 9 or client and their new owner about who 10 the real parties in interest will be 11 going forward. So we did reach out to 12 our client quite a bit ago and raised 13 this issue, but it did take them a little 14 bit of time to figure out who -- who 15 would respond and what to say because of 16 that new turnover. 17 So we do apologize for the delay. 18 That was the bulk of it. We did try to 19 hurry a little bit with the meet and 20 confer with patent owner while trying to 21 give them time to confer with their 22 clients, who work in China. That also 23 took about four days to -- well, we went 24 ahead and e-mailed the Board, actually, 25 before we got the final answer from them
6 1 little bit quickly there. I want to you 2 to particularly explain separate and 3 aside from 325(d) why there is good cause 4 on those issues separately, but I do want 5 a good cause argument on all issues. 6 I'm just telling that asking in 7 this later stage in the game is the -- it 8 does place a burden on the Court as we 9 are -- we are already well -- sorry, not 10 the court -- the Board, as we are well 11 into our work on this case. 12 MR. HOUSTON: Yes, Your Honor. 13 Thank you. I think I -- thank you for 14 that clarification. I believe I 15 understand. 16 And let me start off by apologizing 17 for that delay. Your Honor, our client, 18 Synaffix was recently purchased by a new 19 company called Lonza. That press release 20 just came out in June. And it took us a 21 little time to figure out, and our client 22 time to figure out how that new merger 23 was going to work. And in fact I don't 24 believe there has been a merger, our 25 client still is its own company, but it	8 1 because we were concerned about this 2 delay. But that added to the delay a bit. 3 So we apologize for that. With that, 4 I'll go ahead and explain what the 5 issues -- 6 THE COURT: May I interrupt you for 7 one moment on that. 8 MR. HOUSTON: Of course. Please. 9 THE COURT: So the potential 10 changing of the RPI and the ownership is 11 also of utmost importance to us because 12 we do have a duty as Panel members to 13 exclude ourselves -- to recuse from 14 anything for which we may have a conflict 15 of interest due to ownership of shares or 16 such, as you know. So when do you 17 anticipate being able to update that 18 information? 19 MR. HOUSTON: We have already 20 submitted our draft to the client. We 21 actually did that last week, as soon as 22 we had our first call with the new 23 owners. And we are just waiting to hear 24 back from them. This new company is 25 based in the U.S., so presumably they're

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9 1 observing the Fourth of July holiday. 2 We apologize for that delay, Your 3 Honor. But when we get off the call, we 4 will impress upon them the need to get 5 back to us quickly, and hopefully we can 6 submit those either, if not over the 7 holiday, then but by Wednesday, would be 8 our hope, Your Honor. 9 THE COURT: Okay. And then so we 10 will need to change the caption also 11 going forward and identify that 12 information. So just a remainder there. 13 MR. HOUSTON: Just to clarify, you 14 know, I believe the petitioner company 15 Synaffix is still -- that is still the 16 petitioner. That company has not gone 17 away. They just have a new owner. And 18 so I believe, Your Honor, once we get 19 approval from our client, our intention 20 would be to be just update the real party 21 interest. So I don't believe that would 22 require a change in the case caption, 23 but -- all we would be doing is adding -- 24 potentially adding a real party in 25 interest.	11 1 makes an argument that a reference that 2 is cited on the face of the patent, 3 referred to as Lees L-E-E-S -- I believe 4 that's Exhibit 2026 -- they allege that 5 Lees discloses some of the same chemical 6 structures as what we rely on from Harris 7 and, therefore, they argue that under 8 Beckton Dickinson the same argument was 9 before the Patent Office, and that that 10 should be an additional reason why 325(d) 11 should be relied on to discretionarily 12 deny the petition. 13 Your Honor, as part of our 14 preliminary reply we would like to 15 address that particular argument in three 16 ways. And I would like to start by 17 pointing out that we were not aware of 18 that disclosure in the Lees reference at 19 any time as we prepared the petition. 20 The Lees reference was relied on by the 21 examiner for a different disclosure that 22 is not any longer relevant to the claims 23 the way they were amended. 24 So we did review Lees for that 25 disclosure and its delay. It was relied
10 1 THE COURT: That is correct. Thank 2 you for that clarification. Please 3 proceed. 4 MR. HOUSTON: Okay. Your Honor, on 5 the 325(d) issue, just to make sure the 6 Court kind of understands what's at issue 7 there. The petition has five grounds of 8 unpatentability listed. Four of those 9 five grounds relied on a reference of -- 10 that we refer to as Harris for various 11 disclosure in that reference, various 12 different linker formulas, as well as its 13 teachings regarding water solubility and 14 the desire to achieve better water 15 solubility and to decrease aggregation of 16 the conjugates in solution. We relied on 17 Harris for, you know, a lot of different 18 reasons, encompassing the ones I just 19 mentioned. 20 In the patent owner preliminary 21 response -- Harris was not cited on the 22 face of the patent, Your Honor, so it was 23 not prior art that was before the 24 examiner in that sense. In the patent 25 owner preliminary response, patent owner	12 1 upon during prosecution, but the 2 disclosure that the patent owner 3 preliminary response now points out was 4 not cited by the examiner and was not 5 something that we were aware of. 6 There are -- there are just shy of 7 600 prior art references cited on this 8 patent and most, if not all of those, 9 disclose many different chemical formulas 10 with likely -- in most cases, hundreds of 11 permutations. We were not aware of that 12 particular disclosure and so it was not 13 addressed in the petition at the time. 14 We don't think we or the examiner, you 15 know, could find every single chemical 16 formula disclosed in the 600 references 17 cited on the face of the patent. 18 And so, for that reason, we would 19 like a chance to address this particular 20 argument, in particular pointing out that 21 we rely on Harris for additional 22 chemical formulas, as well as additional 23 teachings that aren't in Lees and aren't 24 cited by the patent owner in their 25 preliminary response. I mean, I can go

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13 1 into more detail on that, Your Honor, but 2 I assume that the finer level of detail 3 on the merits is something you would 4 prefer to save for briefing, if and when 5 it's granted, but I do want to offer to 6 go into more detail there if the Board 7 would like it. 8 THE COURT: No, I don't believe we 9 need that. Are there any other 325(d) 10 arguments that you would like to raise? 11 MR. HOUSTON: Well, Your Honor, the 12 other references were in -- the other 13 main reference, the Morales-Sanfrutos 14 reference was cited on the face of the 15 patent. We cited that in a petition as 16 an anticipatory reference, Your Honor. 17 And so we think the fact that it 18 anticipates the claims that we cited 19 for -- I don't believe it's cited for 20 every challenge claim, but for the claims 21 that we cite it for, you know, just shows 22 that that disclosure was misapprehended 23 or overlooked by the examiner. 24 And so that would be the issue 25 there, Your Honor, although I don't know	15 1 the face of the patent and they can't be 2 responsible for going through all of 3 those references and structures, I think, 4 is a red herring and not really on point 5 here. 6 Lees was one of five prior art 7 preferences and it was a reference that 8 the examiner raised that were 9 anticipatory of the claims that were 10 pending at that time. The Lees reference 11 is not a very cumbersome reference. The 12 disclosure that the examiner relied on in 13 Lees in prosecution is very close, in 14 fact, to the disclosures that we are 15 relying on as part of our 325(d) 16 analysis. So in arguing that they didn't 17 rely on it or weren't aware of it, Your 18 Honor, that reference we believe would 19 have been clearly there. 20 In any event, our response to -- 21 our 325(d) arguments are rooted in 22 response to arguments that petitioner 23 raised in their petition. They argued 24 that two of their prior references, 25 Harris and Snow, did not -- were not
14 1 that we need a preliminary reply to 2 address that. The main issue would be 3 their treatment of Harris, Your Honor. 4 THE COURT: Of Harris. Harris in 5 light of Lees. 6 MR. HOUSTON: Yes. Our Harris 7 reference in light of the Lees reference, 8 yes, Your Honor. 9 THE COURT: All right. And so then 10 I'd like to hear from patent owner on 11 that issue. 12 MS. MATTES: Thank you, your Honor. 13 This is Catherine Mattes on behalf of 14 patent owner. We don't believe that THE 15 petitioner has shown good cause here 16 based on the argument you just heard. 17 Their position that they were not aware 18 of the Lees disclosure is -- is tenuous. 19 This is a reference that the examiner had 20 before her during prosecution. It's one 21 of five prior art references that the 22 examiner has raised as part of a 23 prosecution of the '682 patent. 24 So petitioner's point that there 25 were 600 prior art references cited on	16 1 cited on the prior art references 2 disclosed before the examiner because 3 Harris and Snow disclosed hydrophilic peg 4 linkers comprising the vinyl sulphone or 5 related sulfonyl derivatives. And they 6 claim that that's noncumulative of any 7 art that was before the examiner, so we 8 proposed Lees as a response to that 9 particular argument. 10 It's our position that, you know, 11 our pointing to Lees could have been 12 foreseen. It's not a reference that 13 would be buried among hundreds or 600 14 references. And at the end of the day, 15 petitioner could have reviewed this 16 reference and would have known about it. 17 In addition, even if that's the 18 case, it's our position that additional 19 briefing here is not really necessary. 20 The Board has all the information before 21 it. They're able to review the art and 22 the prior art reference. It's not very 23 complicated. We think that it will be 24 something that you have all the 25 information before you and will be able

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17 1 to address whether or not this art is 2 indeed -- if Harris and Snow is indeed 3 cumulative of the Lees reference. 4 THE COURT: All right. Thank you. 5 Let's move on to Point 2 and 3 about 6 claim construction. 7 MR. HOUSTON: Your Honor, may I 8 address patent owner's response just 9 briefly, two points? 10 THE COURT: Yes. 11 MR. HOUSTON: Two points, Your 12 Honor. One is the disclosure that the 13 patent owner preliminary response relies 14 on in Lees to make this argument, even 15 then they are having to draw from two 16 different parts of the Lees reference. 17 There's a chemical formula in one part 18 and then there's another description in 19 another part that explains what some of 20 the groups can be in that formula. So 21 even then you have to piece together the 22 disclosure to get at that formula. 23 And that is just not a formula or a 24 section of Lees that was ever considered 25 by the examiner as far as the record	19 1 the call, we did characterize these as 2 newly proposed claim construction. And I 3 guess the reason we used that language is 4 because the claim construction arguments 5 being raised in the patent owner 6 preliminary response are not just some 7 kind of rebuttal to positions we took in 8 the petition; rather, the patent owner is 9 proposing very specific and, in our view, 10 very limiting constructions of a number 11 of claim terms. 12 So this is a new argument, a new 13 position that we were not aware of, of 14 course. And I don't think we could have 15 anticipated these particular arguments, 16 because, your Honor, we -- if we are 17 allowed to file a preliminary reply, we 18 will point out how those proposed 19 constructions are not supported by the 20 intrinsic evidence. In fact, the 21 intrinsic evidence would point in the 22 opposite direction. 23 Those claim terms are laid out 24 across Pages 32 to 37 of the patent owner 25 preliminary response. I could go into
18 1 shows, expressly considered by the 2 examiner -- I'm sorry. Let me restate 3 that. 4 It was not a portion of Lees that 5 was ever discussed by the examiner on the 6 record during prosecution. So that's 7 Point 1. 8 The second point, Your Honor, is 9 that we rely on Harris separately for its 10 disclosure of halo ethyl reactive groups, 11 and that's distinct from the vinyl 12 sulphone that are in the structure they 13 point to from Lees. So at a minimum, 14 Harris is not the same as Lees for those 15 chemical formulas, which are also part of 16 what our petition relied on. 17 Thank you, your Honor. 18 THE COURT: Patent owner, any brief 19 response to that? 20 MS. MATTES: No, your Honor. 21 THE COURT: Thank you. All right. 22 Let's move on then, petitioner, to the 23 claim construction issue. 24 MR. HOUSTON: Yes, your Honor. 25 Your Honor, as you noted at the outset of	20 1 them individually if Your Honors would 2 like us to, but the issue is really the 3 same for all of them, which is that 4 patent owner is now proposing 5 constructions for those that are 6 significantly limiting what some of those 7 functional groups can be and what that 8 cell binding agent must be in order to 9 just try to distinguish from the art 10 cited in the petition. 11 So as far as our good cause, Your 12 Honor, this is a claim construction 13 argument raised for the first time in the 14 preliminary response. We think the Board 15 would benefit from hearing -- hearing our 16 position on those claim construction 17 positions and why, at least in our view, 18 those are not proper claim construction; 19 as well as it just being generally in 20 interests of justice to allow us to speak 21 to these issues raised in the patent 22 owner preliminary response that could 23 possibly be dispositive to the argument 24 at issue here. 25 So those would be the two reasons

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21 1 for the good cause on the claim 2 construction arguments, Your Honor. And 3 again, I can go into more of the details 4 on the merits if your Honor would like. 5 Perhaps it would be helpful if I just 6 gave one example, just to give you a 7 flavor. 8 Some of the claims require a cell 9 binding agent, and that's a claim term 10 that the patent owner has now proposed a 11 construction for at Page 37 of their 12 brief. They, in essence, are trying to 13 limit that claim term to just being an 14 antibody, and then trying to say, oh, 15 some of the art cited in the petition 16 doesn't expressly disclose antibodies. 17 Of course, we take a different 18 view. Cell binding agent means just what 19 it says, just an agent that binds to a 20 cell, and that is the position we took in 21 the petition. And we think we can cite 22 numerous pieces of intrinsic evidence to 23 support our evidence on that, Your Honor, 24 and to explain to the Board why this 25 proposed claim construction is not	23 1 is that that is completely contrary to 2 the intrinsic evidence. The patent lists 3 a number of exemplary compounds that have 4 exactly that vinyl sulphone group for 5 meeting the claim limitation. Those are 6 Compounds 75, 119 and 138, I believe. My 7 colleague, Mr. Meara can correct me if I 8 got those numbers wrong. But those are 9 examples. Seventy-five, 119 and 138 are 10 examples of compounds listed in the 11 patent that have the very group that 12 patent owner now says the claims can't be 13 read on. 14 There's also at least one instance 15 in the prosecution history where vinyl 16 sulphone was cited against the patent 17 owner, and instead of trying to explain 18 to the examiner and making a disclaimer 19 of claim scope to say no, no, no, vinyl 20 sulphone can't be both, instead they 21 amended their claim -- they narrowed 22 their claim in other ways without 23 contesting at examiner's finding as to 24 that group. 25 So we think there's numerous
22 1 accurate. And the same would be true for 2 the other terms, as well, your Honor. 3 THE COURT: Can you give me a 4 flavor of what the other terms are? I 5 understand cell binding and the 6 implication. 7 MR. HOUSTON: Sure. One of the 8 other main one that kind of trickles down 9 through many of these is the patent owner 10 is now taking a position that vinyl 11 sulphone, as a group, either has to be 12 the sulphone group that's called for in 13 the claim or it has to be the reactive 14 group that's called for in the claim. 15 So the reactive groups are usually 16 referred to as a Y or Z in the claims. 17 The group that can be a sulphone is the Q 18 and T groups. And, if I understand 19 patent owner's position correctly, in 20 essence, they're saying that you can't 21 break vinyl sulphone up and make it two 22 different things. You can't make it both 23 the reactive group as well as the 24 sulphone group. 25 Our position on that, Your Honor,	24 1 instances of intrinsic evidence to 2 support that would cut against the 3 attempted limitation of the claim terms 4 that the patent owner has advanced in 5 their preliminary response. 6 Does that answer your question, 7 Your Honor? 8 THE COURT: It does. 9 Patent owner, I would like to hear 10 from you on this topic. 11 MS. MATTES: Thank you, Your Honor. 12 From what the petitioner just went 13 through, it sounds -- I didn't really 14 hear a statement of good cause or as to 15 why any of our arguments were, 16 unforeseeable with respect to cell 17 binding agent. It sounds that -- it 18 seems that the petitioner is simply going 19 to parrot what it said in its opening 20 petition, that the term cell binding 21 agent has its plain and ordinary meaning 22 and then told -- it seems to us -- 23 that this attempt for additional reply 24 briefing is not -- is really just for the 25 purpose of just that, to bolster their

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7 (25 to 28)

25 1 argument and to get a chance at 2 additional pages here. 3 I had not heard any basis for good 4 cause. Our claim constructions and our 5 opinion were foreseeable as they clearly 6 rely on the claim language themselves, as 7 well as to the intrinsic record and 8 explain how a person of ordinary skill in 9 the art would interpret the claim terms 10 that we've put forward. 11 We did not put forward any of obscure 12 construction; rather, we are rebutting. 13 And contrary to what petitioner just 14 said, this is a rebuttal to the argument 15 that they raise in petition, in the 16 petition regarding the prior art 17 structures and how those structures map 18 to the elements of the claimed invention. 19 And if you would like, we can go 20 into some examples of that, but we think 21 the petitioner did explain some of those 22 arguments in that they have prior art 23 structures where they're mapping the 24 vinyl sulphone group to more than one 25 claim element in our claimed invention,	27 1 disagreement about what that means. And 2 as I -- as I noted, that Your Honors are 3 more than capable of resolving this issue 4 and you have all the information before 5 you to make the determination. 6 THE COURT: Thank you counsel. 7 Petitioner, any brief reply on that 8 issue? 9 MR. HOUSTON: Yes, your Honor, a 10 couple things. First of all, I don't 11 believe patent owner's counsel is correct 12 when they indicated to the Court that 13 they didn't rely on any extrinsic 14 evidence. They do cite their experts' 15 declaration throughout that section. And 16 so expert testimony regarding the meaning 17 of claim terms would certainly be beyond 18 the intrinsic record. So I just want to 19 correct that one point. 20 Secondly, Your Honor, this is far 21 different than just rebutting our 22 position in the -- in the taking a 23 petition. They are very significantly 24 trying to narrow these claim terms. As I 25 said, one example is trying to make cell
26 1 and we think that's improper. It's not 2 something that requires additional 3 briefing. 4 Once again, everything is before 5 Your Honors. You have the intrinsic 6 record before you. You have the patent 7 and the arguments. We think this is 8 something that the patent -- the Board 9 can handle on its own. Again, we point 10 to just intrinsic record. We don't rely 11 on any extrinsic evidence for our claim 12 construction position. 13 It's very typical for the patent 14 owner in this case, or these types of 15 cases, to seek claim construction of 16 terms in their patents and in rebuttal to 17 these invalidity challenges, especially 18 when the terms are not necessarily 19 squarely addressed by petition. Here 20 they have the opportunity to address 21 claim construction and they chose not to 22 do so, and instead decided to go forward 23 with the plain and ordinary meaning. 24 And everything that was said 25 assumes that the dispute here is just a	28 1 binding agent effectively limited to 2 something that is only for therapeutic 3 purposes, even though that is not 4 consistent with the quotation that is in 5 the patent and that they, themselves, 6 actually quote, but then they try to 7 narrow it. And then they try to read 8 something into the word agent, as well, 9 in the claim term cell binding agent. 10 So we just think that is a good 11 example of where they are taking a 12 position that I'm not sure how we would 13 anticipate that position given that it 14 just, in our view, is not supported by 15 the intrinsic record, and I do think that 16 is one of the reasons for good cause to 17 allow a preliminary reply to give us a 18 chance to respond to dispositive issues 19 newly raised in the patent owner 20 response, and I do think it would benefit 21 the Board to hear from us on that issue 22 to try to get these claim construction 23 issues correct. 24 THE COURT: Understood. Patent 25 owner counsel, any response to that?

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29 1 MS. MATTES: Yes. With respect to 2 the cell binding agent, our petition is 3 not that it's necessarily limited to an 4 antibody. We actually proposed a 5 construction in our -- in our patent 6 owner response on Pages 37 through 38 7 that rely on the patent specification for 8 the understanding what a cell binding 9 agent is, and application of that. 10 And then -- excuse me. We base 11 that in terms of the lexicography that is 12 found in the patent itself. And that 13 particular lexicography is used -- it is 14 in rebuttal to arguments made by the 15 petitioner, with certain references they 16 claim disclosed cell binding agents, and 17 it's our argument that they do not. And 18 part of our reasoning for why they do not 19 is because of the lexicography that is 20 found in the specification for what a 21 cell binding agent is. 22 Thank you, Your Honor. 23 THE COURT: Thank you. All right. 24 If you will hold the line for just a 25 moment and let the panel confer.	31 1 understanding, analogous art does not 2 apply in the context of anticipatory 3 prior art. And that also has 4 implications for Harris, as well, Your 5 Honor, which was cited, in part at least, 6 for 102 grounds, as well. 7 The second argument, Your Honor, is 8 simply to point out how the analogous art 9 argument they do make as to Harris, for 10 example, are really tied to those claim 11 constructions. So by trying to very 12 specifically limit the claims to intended 13 uses and to certain things that can 14 perform those intended uses, they are -- 15 that is the only way that they can get 16 around and really have a leg to stand on 17 to argue analogous art. So we put that 18 in our request, Your Honor, so that we 19 could point out sort of the overlap 20 between the claim construction issues and 21 the analogous art issue. 22 We do have sections in our petition 23 describing each of the references and how 24 they're relevant to the field of endeavor 25 and the problems that are solved by these
30 1 MR. HOUSTON: Your Honor, I believe 2 we have the analogous art issue still. 3 THE COURT: Oh, you're right. I 4 apologize. 5 MR. HOUSTON: If you want to confer 6 about what you've heard so far, that's 7 fine; I just wanted to make sure that we 8 weren't overlooking that. 9 THE COURT: No, please proceed. 10 MR. HOUSTON: Okay. Thank you, 11 Your Honor. 12 The last issue that we have in our 13 e-mail was to address patent owner's 14 analogous art arguments raised in the 15 patent owner preliminary response. There 16 are really two issues there, Your Honor. 17 The first is that, we'd like to 18 point out to the Board that at least part 19 of that argument is just legally unfound. 20 They raised the analogous art argument in 21 the context of the Morales-Sanfrutos 22 reference, for example, but this was 23 cited as a 102 anticipatory prior art 24 reference, not as part of a 103 25 obviousness combination. And so to our	32 1 inventors. We don't really see a need to 2 embellish on that. That is not our 3 intent here, Your Honor. We're 4 comfortable with the descriptions we have 5 of this prior art reference in the 6 petition, but we do think that the Board 7 may benefit from seeing the interplay of 8 the various issues on the analogous art 9 argument, in addition to the legal issue 10 that we identified. 11 THE COURT: Patent owner, from your 12 perspective, please. 13 MS. MATTES: Thank you, Your Honor. 14 From our perspective of this claim 15 construction, we believe that the 16 petitioner has not shown good cause with 17 respect to the analogous art issue. With 18 respect to his first point about raising 19 arguments about analogous art with 20 respect to Morales-Sanfrutos and Harris 21 in the context of 102, our analogous art 22 arguments are in our background of our 23 Prior Art section. We're talking 24 about -- we specifically argue that they 25 are -- this is art that a person of

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33 1 ordinary skill in the art would not turn 2 to and would not rely on and would not be 3 motivated to combine the teaching 4 together or use one to get to our claimed 5 invention. 6 Some of these references, while may 7 be raised in a 102 context, are also 8 raised in a 103 context or as background 9 that they could be art and so are 10 analogous. Our arguments are relevant to 11 both issues. And whether or not it's 12 legally proper or not, again, we don't 13 think requires or justifies additional 14 briefing on this issue. This is a 15 determination the Board is more 16 than capable of handling on its own. 17 With respect to the second issue 18 that petitioner raised, that they 19 had -- they want to, I guess, provide 20 more clarity or put in their reply as to 21 why Harris is analogous art over the 22 arguments we made as to why it is not, 23 again, it's our perspective that our 24 claim construction positions are not 25 something that are obscure or strange.	35 1 the context of the 325(d) section, as 2 well as in the analogous art argument, 3 and on the one hand they're arguing that 4 those arguments were in front of the 5 examiner and that the examiner considered 6 them, and on the other hand they're 7 arguing that Harris is not analogous art. 8 It just isn't even in the same field. 9 So I think there's also a little 10 bit of inconsistency that may be helpful 11 for the Board to allow us to flesh out 12 and hear from us on that point, as well. 13 But again, Your Honor, you know, from our 14 point of view they are proposing very 15 restrictive interpretations of many of 16 these claim terms that we don't think are 17 supported, and then that is what is 18 allowing them to make the -- some of 19 their analogous art arguments that we 20 just don't think are proper, Your Honor. 21 So I don't have anything further to 22 say on that unless the Board has specific 23 questions. 24 THE COURT: Just one question. 25 We're going to take this under advisement
34 1 They should have been foreseen. They 2 were very much foreseeable. 3 The Harris reference discloses 4 vinyl sulphone linkers. You know, we 5 argue that they do not disclose vinyl 6 sulphone linkers that map to our claimed 7 invention. And we just explain why a 8 person of ordinary skill in the art would 9 not have looked to those particular -- 10 that particular reference in trying to 11 come up with a claimed invention. 12 So once again, we just believe that 13 Your Honors have those references before 14 them and can make the determination as to 15 whether you agree or not with our 16 argument. 17 THE COURT: Thank you, counsel. 18 Petitioner, any response on that 19 issue? 20 MR. HOUSTON: Your Honor, I think 21 the only other thing I guess I would 22 point out after hearing patent owner's 23 comment is, I do find it a little bit 24 striking that, at least as to Harris, the 25 Harris reference that comes up both in	36 1 but I would like to ask both parties, if 2 we were to grant some limited briefing on 3 this issue, petitioner, when could you 4 have that briefing in given that we are 5 well into this case, as we discussed 6 earlier? 7 MR. HOUSTON: Your Honor, our 8 preference, if you -- if the Board would 9 allow us, our preference would be to have 10 it in a week from Wednesday. We 11 basically would like a week to prepare. 12 We haven't been able to get in touch with 13 our client because of the holiday, I 14 presume. But we are hoping for a week 15 from Wednesday. 16 However, if the Board -- you know, 17 we appreciate we are a little late in 18 raising the issue. If the Board would 19 find it beneficial to have it even sooner 20 than that, we will meet whatever deadline 21 the Board would like to operate under. 22 THE COURT: Okay. And patent 23 owner, I know you have a client that 24 oversees. How about you? 25 MS. MATTES: Yes, Your Honor. I

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10 (37 to 40)

37 1 think given -- given the location of our 2 client, as well, we would prefer having 3 about two weeks to respond. 4 THE COURT: And -- 5 MS. MATTES: And, Your Honor -- 6 THE COURT: Yes. 7 MS. MATTES: Sorry. One other 8 point we wanted to raise was whether, if 9 briefing is allowed, we believe that a 10 ten-page request would be -- is a bit 11 excessive for the issues that we've 12 discussed today and we would request that 13 it be less than that. 14 THE COURT: All right, understood. 15 As I said, we will take this under 16 advisement. Because of the limited time 17 frame, I'm not inclined to grant all the 18 time allowed should we be granting a 19 briefing. So it may be shorter. We will 20 endeavor to get this out today, if we can 21 possibly do so. We do have limited staff 22 because we are on the eve of the 23 deadline, but we'll endeavor to get it 24 out today to get you your decision. 25 Anything else before we wrap up?	39 1 questions for anybody before we get off 2 the line. 3 THE REPORTER: Just some of the 4 spellings would be helpful. 5 MR. HOUSTON: We're happy to stay 6 on the line. If there's nothing further 7 from the Board, we can handle that with 8 the court reporter. 9 THE COURT: Can you submit that 10 over to patent owner just so patent owner 11 can double check that before filing it as 12 an exhibit? 13 MR. HOUSTON: Sure. We're happy to 14 do that, and also I would like patent 15 owner's counsel to stay on the line to 16 make sure my spelling is correct, as 17 well, but we will work that out, Your 18 Honor. 19 THE COURT: All right. Thank you. 20 21 22 (Thereupon, the proceedings were 23 concluded at approximately 2:11 p.m.) 24 25
38 1 MR. HOUSTON: Nothing -- 2 MS. MATTES: One more -- 3 MR. HOUSTON: -- from the 4 petitioner, Your Honor. Oh. 5 THE COURT: Yeah, sorry. 6 MS. MATTES: Yes, I apologize. I 7 didn't mean to interrupt. 8 One point of clarification on the 9 briefing should it be granted. Would it 10 -- it would not include additional 11 evidence or declarations; is that 12 correct? 13 THE COURT: That is generally how 14 we proceed with the surreply. I need to 15 consider that somewhat when we are in the 16 instance that petitioner raised where we 17 have the patent owner's expert opining on 18 the claim construction. So I -- that 19 will be clear in the order. 20 MS. MATTES: Okay. 21 THE COURT: Anything further? 22 MR. HOUSTON: Nothing from 23 petitioner, Your Honor. Maybe I'll just 24 pause to ask if the court reporter was 25 able to transcribe everything or have any	40 1 C E R T I F I C A T E 2 3 I, Tanya Verhoven-Page, CCR, LCR, CSR, do hereby 4 certify that the witness was duly sworn by me and 5 that I was authorized to and did report said 6 proceedings. 7 I further certify that the foregoing transcript 8 is a true and correct record of the proceedings; that 9 said proceedings were taken by me stenographically 10 and thereafter reduced to typewriting under my 11 supervision; that reading and signing was requested; 12 and that I am neither attorney nor counsel for, nor 13 related to or employed by, any of the parties to the 14 action in which this deposition was taken; and that I 15 have no interest, financial or otherwise, in this 16 case. 17 IN WITNESS WHEREOF, I have hereunto set my hand 18 this 14th day of July, 2023. 19 20 21 22 23 24 25 Tanya L. Verhoven-Page, Certified Court Reporter, CCR-B-1790, CSR-12254 and LCR-991.

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