

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SYNAFFIX B.V.,
Petitioner,

v.

HANGZHOU DAC BIOTECH CO., LTD.,
Patent Owner.

IPR2022-01531
U.S. Patent No. 10,131,682

DECLARATION OF JUNE ANN MUNFORD

1. My name is June Ann Munford. I am over the age of 18, have personal knowledge of the facts set forth herein, and am competent to testify to the same.
2. I have been retained on behalf of the Patent Owner to provide assistance in the above-illustrated matter in establishing the authenticity and public availability of the documents discussed in this declaration. I am being compensated for my services in this matter at the rate of \$200.00 per hour plus reasonable expenses. My statements are objective, and my compensation does not depend on the outcome of this matter.
3. I earned a Master of Library and Information Science (MLIS) from the University of Wisconsin-Milwaukee in 2009. I have over ten years of experience in the library/information science field. Beginning in 2004, I have served in various positions in the public library sector including Assistant Librarian, Youth Services Librarian and Library Director. I have attached my Curriculum Vitae as Appendix CV.
4. During my career in the library profession, I have been responsible for materials acquisition for multiple libraries. In that position, I have cataloged, purchased and processed incoming library works. That includes purchasing

materials directly from vendors, recording publishing data from the material in question, creating detailed material records for library catalogs and physically preparing that material for circulation. In addition to my experience in acquisitions, I was also responsible for analyzing large collections of library materials, tailoring library records for optimal catalog search performance and creating lending agreements between libraries during my time as a Library Director.

5. I am fully familiar with the catalog record creation process in the library sector. In preparing a material for public availability, a library catalog record describing that material would be created. These records are typically written in Machine Readable Catalog (herein referred to as “MARC”) code and contain information such as a physical description of the material, metadata from the material’s publisher, and date of library acquisition. In particular, the 008 field of the MARC record is reserved for denoting the date of creation of the library record itself. As this typically occurs during the process of preparing materials for public access, it is my experience that an item’s MARC record indicates the date of an item’s public availability.

6. Typically, in creating a MARC record, a librarian would gather various bits of metadata such as book title, publisher and subject headings among others

and assign each value to a relevant numerical field. For example, a book's physical description is tracked in field 300 while title/attribution is tracked in field 245. The 008 field of the MARC record is reserved for denoting the creation of the library record itself. As this is the only date reflecting the inclusion of said materials within the library's collection, it is my experience that an item's 008 field accurately indicates the date of an item's public availability.

7.I have reviewed Exhibit 2003, "Polymeric drugs for efficient tumor-targeted drug delivery based on EPR-effect" by H. Maeda, et al as published in European Journal of Pharmaceutics and Biopharmaceutics March 2009.

8.Attached hereto as Appendix MAEDA01 is a true and correct copy of the MARC record for European Journal of Pharmaceutics and Biopharmaceutics as held by the University of California Los Angeles Library. I secured this record myself from the library's public catalog. The MARC record contained within Appendix MAEDA01 accurately describes the title, publisher and ISSN number of European Journal of Pharmaceutics and Biopharmaceutics. The Location Items field present on page 2 of this record indicates the library's collection includes the March 2009 issue of European

Journal of Pharmaceutics and Biopharmaceutics containing "Polymeric drugs for efficient tumor-targeted drug delivery based on EPR-effect".

9.Attached hereto as Appendix MAEDA02 is a true and correct copy of "Polymeric drugs for efficient tumor-targeted drug delivery based on EPR-effect" as published in European Journal of Pharmaceutics and Biopharmaceutics as held by the University of California Los Angeles Library. These scans were secured from the library's collection. In comparing Exhibit 2003 to Appendix MAEDA02, it is my determination that Exhibit 2003 is a true and correct copy of "Polymeric drugs for efficient tumor-targeted drug delivery based on EPR-effect" by H. Maeda, et al as published in European Journal of Pharmaceutics and Biopharmaceutics.

10.Attached hereto as Appendix MAEDA03 is a true and correct copy of "Polymeric drugs for efficient tumor-targeted drug delivery based on EPR-effect" as published in European Journal of Pharmaceutics and Biopharmaceutics as held by the University of California Los Angeles Library. This PDF was secured from the library's collection. In comparing Exhibit 2003 to Appendix MAEDA03, it is my determination that Exhibit 2003 is a true and correct copy of "Polymeric drugs for efficient tumor-

targeted drug delivery based on EPR-effect" by H. Maeda, et al as published in European Journal of Pharmaceutics and Biopharmaceutics.

11.The 008 field of the MARC record in Appendix MAEDA01 indicates the date of record creation. The 008 field of Appendix MAEDA01 indicates the University of California Los Angeles Library first acquired European Journal of Pharmaceutics and Biopharmaceutics as of July 29, 1991 and held the journal in perpetuity until the publication of "Polymeric drugs for efficient tumor-targeted drug delivery based on EPR-effect". Considering this information, it is my determination that European Journal of Pharmaceutics and Biopharmaceutics March 2009 and therefore "Polymeric drugs for efficient tumor-targeted drug delivery based on EPR-effect" was made available to the public shortly after its initial publication in March 2009.

12.I have reviewed Exhibit 2004, "Antibody-drug conjugates - a perfect synergy" by John R. Adair, et al as published in Expert Opinion on Biological Therapy September 2012.

13.Attached hereto as Appendix ADAIR01 is a true and correct copy of the MARC record for Expert Opinion on Biological Therapy as held by the

University of California Los Angeles Library. I secured this record myself from the library's public catalog. The MARC record contained within Appendix ADAIR01 accurately describes the title, publisher and ISSN number of Expert Opinion on Biological Therapy. The Online Access field present on page 2 of this record indicates the library's collection includes the September 2012 issue of Expert Opinion on Biological Therapy containing "Antibody-drug conjugates - a perfect synergy".

14. Attached hereto as Appendix ADAIR02 is a true and correct copy of "Antibody-drug conjugates - a perfect synergy" as published in Expert Opinion on Biological Therapy as held by the University of California Los Angeles Library. This PDF was secured from the library's collection. In comparing Exhibit 2004 to Appendix ADAIR02, it is my determination that Exhibit 2004 is a true and correct copy of "Antibody-drug conjugates - a perfect synergy" by John R. Adair, et al as published in Expert Opinion on Biological Therapy.

15. The 008 field of the MARC record in Appendix ADAIR01 indicates the date of record creation. The 008 field of Appendix ADAIR01 indicates the University of California Los Angeles Library first acquired Expert Opinion on Biological Therapy as of January 6, 2005 and held the journal in

perpetuity until the publication of "Antibody-drug conjugates - a perfect synergy". Considering this information, it is my determination that Expert Opinion on Biological Therapy September 2012 and therefore "Antibody-drug conjugates - a perfect synergy" was made available to the public shortly after its initial publication in September 2012.

16. I have reviewed Exhibit 2005, "Antibody-Maytansinoid Conjugates Designed to Bypass Multidrug Resistance" by Yelena V. Kovtun, et al as published in Cancer Research March 15, 2010.
17. Attached hereto as Appendix KOVTUN01 is a true and correct copy of the MARC record for Cancer Research as held by the Penn State University Library. I secured this record myself from the library's public catalog. The MARC record contained within Appendix KOVTUN01 accurately describes the title, publisher and ISSN number of Cancer Research. The Availability field present on page 11 of this record indicates the library's collection includes the March 15, 2010 issue of Cancer Research containing "Antibody-Maytansinoid Conjugates Designed to Bypass Multidrug Resistance".

18. Attached hereto as Appendix KOVTUN02 is a true and correct copy of "Antibody-Maytansinoid Conjugates Designed to Bypass Multidrug Resistance" as published in Cancer Research as held by the Penn State University Library. These scans were secured from the library's collection. In comparing Exhibit 2005 to Appendix KOVTUN02, it is my determination that Exhibit 2005 is a true and correct copy of "Antibody-Maytansinoid Conjugates Designed to Bypass Multidrug Resistance" by Yelena V. Kovtun, et al as published in Cancer Research.

19. The 008 field of the MARC record in Appendix KOVTUN01 indicates the date of record creation. The 008 field of Appendix KOVTUN01 indicates the Penn State University Library first acquired Cancer Research as of August 17, 1975 and held the journal in perpetuity until the publication of "Antibody-Maytansinoid Conjugates Designed to Bypass Multidrug Resistance". Considering this information, it is my determination that Cancer Research March 15, 2010 and therefore "Antibody-Maytansinoid Conjugates Designed to Bypass Multidrug Resistance" was made available to the public shortly after its initial publication in March 15, 2010.

20.I have reviewed Exhibit 2006, "Antibody-drug conjugates: using monoclonal antibodies for delivery of cytotoxic payloads to cancer cells" by Victor S. Goldmacher, et al as published in Therapeutic Delivery March 2011.

21.Attached hereto as Appendix GOLDMACHER01 is a true and correct copy of the MARC record for Therapeutic Delivery as held by the University of California Los Angeles Library. I secured this record myself from the library's public catalog. The MARC record contained within Appendix GOLDMACHER01 accurately describes the title, publisher and ISSN number of Therapeutic Delivery. The Online Access field present on page 2 of this record indicates the library's collection includes the March 2011 issue of Therapeutic Delivery containing "Antibody-drug conjugates: using monoclonal antibodies for delivery of cytotoxic payloads to cancer cells".

22.Attached hereto as Appendix GOLDMACHER02 is a true and correct copy of "Antibody-drug conjugates: using monoclonal antibodies for delivery of cytotoxic payloads to cancer cells" as published in Therapeutic Delivery as held by the University of California Los Angeles Library. This PDF was secured from the library's collection. In comparing Exhibit 2006 to Appendix GOLDMACHER02, it is my determination that Exhibit 2006 is a true and correct copy of "Antibody-drug conjugates: using monoclonal

antibodies for delivery of cytotoxic payloads to cancer cells" by Victor S. Goldmacher, et al as published in Therapeutic Delivery.

23.The 008 field of the MARC record in Appendix GOLDMACHER01 indicates the date of record creation. The 008 field of Appendix GOLDMACHER01 indicates the University of California Los Angeles Library first acquired Therapeutic Delivery as of August 23, 2010 and held the journal in perpetuity until the publication of "Antibody-drug conjugates: using monoclonal antibodies for delivery of cytotoxic payloads to cancer cells". Considering this information, it is my determination that Therapeutic Delivery March 2011 and therefore "Antibody-drug conjugates: using monoclonal antibodies for delivery of cytotoxic payloads to cancer cells" was made available to the public shortly after its initial publication in March 2011.

24.I have reviewed Exhibit 2007, "Antibody-Drug Conjugates: Linking Cytotoxic Payloads to Monoclonal Antibodies" by Laurent Ducry, et al as published in Bioconjugate Chemistry January 2010.

25.Attached hereto as Appendix DUCRY01 is a true and correct copy of the MARC record for Bioconjugate Chemistry as held by the Penn State

University Library. I secured this record myself from the library's public catalog. The MARC record contained within Appendix DUCRY01 accurately describes the title, publisher and ISSN number of Bioconjugate Chemistry. The Showing Results field present on page 3 of this record indicates the library's collection includes the January 2010 issue of Bioconjugate Chemistry containing "Antibody-Drug Conjugates: Linking Cytotoxic Payloads to Monoclonal Antibodies".

26. Attached hereto as Appendix DUCRY02 is a true and correct copy of "Antibody-Drug Conjugates: Linking Cytotoxic Payloads to Monoclonal Antibodies" as published in Bioconjugate Chemistry as held by the Penn State University Library. This PDF was secured from the library's collection. In comparing Exhibit 2007 to Appendix DUCRY02, it is my determination that Exhibit 2007 is a true and correct copy of "Antibody-Drug Conjugates: Linking Cytotoxic Payloads to Monoclonal Antibodies" by Laurent Ducry, et al as published in Bioconjugate Chemistry.

27. The 008 field of the MARC record in Appendix DUCRY01 indicates the date of record creation. The 008 field of Appendix DUCRY01 indicates the Penn State University Library first acquired Bioconjugate Chemistry as of July 30, 1997 and held the journal in perpetuity until the publication of

"Antibody-Drug Conjugates: Linking Cytotoxic Payloads to Monoclonal Antibodies". Considering this information, it is my determination that Bioconjugate Chemistry January 2010 and therefore "Antibody-Drug Conjugates: Linking Cytotoxic Payloads to Monoclonal Antibodies" was made available to the public shortly after its initial publication in January 2010.

28.I have reviewed Exhibit 2008, "Antibody-Drug Conjugates for Cancer Therapy" by Paul J. Carter, et al as published in The Cancer Journal June 2008.

29.Attached hereto as Appendix CARTER01 is a true and correct copy of the MARC record for The Cancer Journal as held by the Penn State University Library. I secured this record myself from the library's public catalog. The MARC record contained within Appendix CARTER01 accurately describes the title, publisher and ISSN number of The Cancer Journal. The Showing Results field present on page 3 of this record indicates the library's collection includes the June 2008 issue of The Cancer Journal containing "Antibody-Drug Conjugates for Cancer Therapy".

30. Attached hereto as Appendix CARTER02 is a true and correct copy of "Antibody-Drug Conjugates for Cancer Therapy" as published in The Cancer Journal as held by the Penn State University Library. This PDF was secured from the library's collection. In comparing Exhibit 2008 to Appendix CARTER02, it is my determination that Exhibit 2008 is a true and correct copy of "Antibody-Drug Conjugates for Cancer Therapy" by Paul J. Carter, et al as published in The Cancer Journal.
31. The 008 field of the MARC record in Appendix CARTER01 indicates the date of record creation. The 008 field of Appendix CARTER01 indicates the Penn State University Library first acquired The Cancer Journal as of June 7, 2002 and held the journal in perpetuity until the publication of "Antibody-Drug Conjugates for Cancer Therapy". Considering this information, it is my determination that The Cancer Journal June 2008 and therefore "Antibody-Drug Conjugates for Cancer Therapy" was made available to the public shortly after its initial publication in June 2008.
32. I have reviewed Exhibit 2009, "Formulation and delivery issues for monoclonal antibody therapeutics" by Ann L. Daugherty, et al as published in Advanced Drug Delivery Reviews August 7, 2006.

33. Attached hereto as Appendix DAUGHERTY01 is a true and correct copy of the MARC record for Advanced Drug Delivery Reviews as held by the Penn State University Library. I secured this record myself from the library's public catalog. The MARC record contained within Appendix DAUGHERTY01 accurately describes the title, publisher and ISSN number of Advanced Drug Delivery Reviews. The Showing Results field present on page 3 of this record indicates the library's collection includes the August 7, 2006 issue of Advanced Drug Delivery Reviews containing "Formulation and delivery issues for monoclonal antibody therapeutics".

34. Attached hereto as Appendix DAUGHERTY02 is a true and correct copy of "Formulation and delivery issues for monoclonal antibody therapeutics" as published in Advanced Drug Delivery Reviews as held by the Penn State University Library. This PDF was secured from the library's collection. In comparing Exhibit 2009 to Appendix DAUGHERTY02, it is my determination that Exhibit 2009 is a true and correct copy of "Formulation and delivery issues for monoclonal antibody therapeutics" by Ann L. Daugherty, et al as published in Advanced Drug Delivery Reviews.

35. The 008 field of the MARC record in Appendix DAUGHERTY01 indicates the date of record creation. The 008 field of Appendix DAUGHERTY01

indicates the Penn State University Library first acquired Advanced Drug Delivery Reviews as of February 23, 1998 and held the journal in perpetuity until the publication of "Formulation and delivery issues for monoclonal antibody therapeutics". Considering this information, it is my determination that Advanced Drug Delivery Reviews August 7, 2006 and therefore "Formulation and delivery issues for monoclonal antibody therapeutics" was made available to the public shortly after its initial publication in August 7, 2006.

36.I have reviewed Exhibit 2010, "Evaluation of Ketone-Oxime Method for Developing Therapeutic On-Demand Cleavable Immunoconjugates" by Pappanaicken R. Kumaresan, et al as published in Bioconjugate Chemistry June 2008.

37.Attached hereto as Appendix KUMARESAN01 is a true and correct copy of the MARC record for Bioconjugate Chemistry as held by the Penn State University Library. I secured this record myself from the library's public catalog. The MARC record contained within Appendix KUMARESAN01 accurately describes the title, publisher and ISSN number of Bioconjugate Chemistry. The Showing Results field present on page 3 of this record indicates the library's collection includes the June 2008 issue of

Bioconjugate Chemistry containing "Evaluation of Ketone-Oxime Method for Developing Therapeutic On-Demand Cleavable Immunoconjugates".

38. Attached hereto as Appendix KUMARESAN02 is a true and correct copy of "Evaluation of Ketone-Oxime Method for Developing Therapeutic On-Demand Cleavable Immunoconjugates" as published in Bioconjugate Chemistry as held by the Penn State University Library. This PDF was secured from the library's collection. In comparing Exhibit 2010 to Appendix KUMARESAN02, it is my determination that Exhibit 2010 is a true and correct copy of "Evaluation of Ketone-Oxime Method for Developing Therapeutic On-Demand Cleavable Immunoconjugates" by Pappanaicken R. Kumaresan, et al as published in Bioconjugate Chemistry.

39. The 008 field of the MARC record in Appendix KUMARESAN01 indicates the date of record creation. The 008 field of Appendix KUMARESAN01 indicates the Penn State University Library first acquired Bioconjugate Chemistry as of July 30, 1997 and held the journal in perpetuity until the publication of "Evaluation of Ketone-Oxime Method for Developing Therapeutic On-Demand Cleavable Immunoconjugates". Considering this information, it is my determination that Bioconjugate Chemistry June 2008 and therefore "Evaluation of Ketone-Oxime Method for Developing

Therapeutic On-Demand Cleavable Immunoconjugates" was made available to the public shortly after its initial publication in June 2008.

40. I have reviewed Exhibit 2011, "Expanded Utility of the β -Glucuronide

Linker: ADCs That Deliver Phenolic Cytotoxic Agents" by Scott C. Jeffrey, et al as published in ACS Medicinal Chemistry Letters September 2010.

41. Attached hereto as Appendix JEFFREY01 is a true and correct copy of the MARC record for ACS Medicinal Chemistry Letters as held by the Penn State University Library. I secured this record myself from the library's public catalog. The MARC record contained within Appendix JEFFREY01 accurately describes the title, publisher and ISSN number of ACS Medicinal Chemistry Letters. The Showing Results field present on page 3 of this record indicates the library's collection includes the September 2010 issue of ACS Medicinal Chemistry Letters containing "Expanded Utility of the β -Glucuronide Linker: ADCs That Deliver Phenolic Cytotoxic Agents".

42. Attached hereto as Appendix JEFFREY02 is a true and correct copy of "Expanded Utility of the β -Glucuronide Linker: ADCs That Deliver Phenolic Cytotoxic Agents" as published in ACS Medicinal Chemistry Letters as held by the Penn State University Library. This PDF was secured

from the library's collection. In comparing Exhibit 2011 to Appendix JEFFREY02, it is my determination that Exhibit 2011 is a true and correct copy of "Expanded Utility of the β -Glucuronide Linker: ADCs That Deliver Phenolic Cytotoxic Agents" by Scott C. Jeffrey, et al as published in ACS Medicinal Chemistry Letters.

43.The 008 field of the MARC record in Appendix JEFFREY01 indicates the date of record creation. The 008 field of Appendix JEFFREY01 indicates the Penn State University Library first acquired ACS Medicinal Chemistry Letters as of October 9, 2009 and held the journal in perpetuity until the publication of "Expanded Utility of the β -Glucuronide Linker: ADCs That Deliver Phenolic Cytotoxic Agents". Considering this information, it is my determination that ACS Medicinal Chemistry Letters September 2010 and therefore "Expanded Utility of the β -Glucuronide Linker: ADCs That Deliver Phenolic Cytotoxic Agents" was made available to the public shortly after its initial publication in September 2010.

44.I have reviewed Exhibit 2012, "Michael addition reactions in macromolecular design for emerging technologies" by Brian D. Mather, et al as published in Progress in Polymer Science May 2006.

45. Attached hereto as Appendix MATHER01 is a true and correct copy of the MARC record for Progress in Polymer Science as held by the Penn State University Library. I secured this record myself from the library's public catalog. The MARC record contained within Appendix MATHER01 accurately describes the title, publisher and ISSN number of Progress in Polymer Science. The Showing Results field present on page 3 of this record indicates the library's collection includes the May 2006 issue of Progress in Polymer Science containing "Michael addition reactions in macromolecular design for emerging technologies".

46. Attached hereto as Appendix MATHER02 is a true and correct copy of "Michael addition reactions in macromolecular design for emerging technologies" as published in Progress in Polymer Science as held by the Penn State University Library. This PDF was secured from the library's collection. In comparing Exhibit 2012 to Appendix MATHER02, it is my determination that Exhibit 2012 is a true and correct copy of "Michael addition reactions in macromolecular design for emerging technologies" by Brian D. Mather, et al as published in Progress in Polymer Science.

47. The 008 field of the MARC record in Appendix MATHER01 indicates the date of record creation. The 008 field of Appendix MATHER01 indicates

the Penn State University Library first acquired Progress in Polymer Science as of June 4, 1998 and held the journal in perpetuity until the publication of "Michael addition reactions in macromolecular design for emerging technologies". Considering this information, it is my determination that Progress in Polymer Science May 2006 and therefore "Michael addition reactions in macromolecular design for emerging technologies" was made available to the public shortly after its initial publication in May 2006.

48.I have reviewed Exhibit 2013, a paper entitled "Vinyl Sulfone: A Multi-Purpose Function in Proteomics" by F. Javier Lopez-Jaramillo as published in Integrative Proteomics. The 'published online' and 'published in print' fields on page 27 of Exhibit 2013 indicate "Vinyl Sulfone: A Multi-Purpose Function in Proteomics" was first published in February 2012.

49.Attached hereto as Appendix LOPEZ01 is a screen capture of a webpage entitled Integrative Proteomics as hosted on the Directory of Open Access Books website. I secured these screen captures myself from <https://directory.doabooks.org/handle/20.500.12854/129123>.

50.Appendix LOPEZ01 contains a true and correct copy of "Vinyl Sulfone: A Multi-Purpose Function in Proteomics" by F. Javier Lopez-Jaramillo as

published in Integrative Proteomics from the Directory of Open Access Books website. In comparing Appendix LOPEZ01 to Exhibit 2013, it is my determination that Exhibit 2013 is a true and correct copy of "Vinyl Sulfone: A Multi-Purpose Function in Proteomics" by F. Javier Lopez-Jaramillo as published in Integrative Proteomics.

51. Attached hereto as Appendix LOPEZ02 is a screen capture of the Internet Archive Wayback Machine entry for <http://www.intechopen.com/books/integrative-proteomics>. I secured these screen captures myself from <https://web.archive.org/web/20120604165051/http://www.intechopen.com/books/integrative-proteomics>. This record was captured as of June 4, 2012.

52. Appendix LOPEZ02 is an Internet Archive capture of a web page entitled Integrative Proteomics as hosted on the Intech website. The web page captured in this record contains a download link for a PDF copy of Integrative Proteomics visible on page 2 of Appendix LOPEZ02. Appendix LOPEZ02 also contains a download link for a PDF copy of "Vinyl Sulfone: A Multi-Purpose Function in Proteomics" as visible on page 3 of this Appendix. The existence of these download links indicates that users of the Intech website would have been able to access Integrative Proteomics and

thus "Vinyl Sulfone: A Multi-Purpose Function in Proteomics" as of June 4, 2012 and likely earlier on the original Intech website. As such, it is my determination that "Vinyl Sulfone: A Multi-Purpose Function in Proteomics" was first available to the public as of June 4, 2012.

53.I have reviewed Exhibit 2014, "Impact of linker and conjugation chemistry on antigen binding, Fc receptor binding and thermal stability of model antibody-drug conjugates" by Mauro Acchione, et al as published in mAbs May-June 2012.

54.Attached hereto as Appendix ACCHIONE01 is a true and correct copy of the MARC record for mAbs as held by the University of California Los Angeles Library. I secured this record myself from the library's public catalog. The MARC record contained within Appendix ACCHIONE01 accurately describes the title, publisher and ISSN number of mAbs. The Online Access field present on page 2 of this record indicates the library's collection includes the May-June 2012 issue of mAbs containing "Impact of linker and conjugation chemistry on antigen binding, Fc receptor binding and thermal stability of model antibody-drug conjugates".

55. Attached hereto as Appendix ACCHIONE02 is a true and correct copy of "Impact of linker and conjugation chemistry on antigen binding, Fc receptor binding and thermal stability of model antibody-drug conjugates" as published in mAbs as held by the University of California Los Angeles Library. This PDF was secured from the library's collection. In comparing Exhibit 2014 to Appendix ACCHIONE02, it is my determination that Exhibit 2014 is a true and correct copy of "Impact of linker and conjugation chemistry on antigen binding, Fc receptor binding and thermal stability of model antibody-drug conjugates" by Mauro Acchione, et al as published in mAbs.

56. The 008 field of the MARC record in Appendix ACCHIONE01 indicates the date of record creation. The 008 field of Appendix ACCHIONE01 indicates the University of California Los Angeles Library first acquired mAbs as of April 22, 2008 and held the journal in perpetuity until the publication of "Impact of linker and conjugation chemistry on antigen binding, Fc receptor binding and thermal stability of model antibody-drug conjugates". Considering this information, it is my determination that mAbs May-June 2012 and therefore "Impact of linker and conjugation chemistry on antigen binding, Fc receptor binding and thermal stability of model antibody-drug

conjugates" was made available to the public shortly after its initial publication in May-June 2012.

57.I have reviewed Exhibit 2015, "Effects of Drug Loading on the Antitumor Activity of a Monoclonal Antibody Drug Conjugate" by Kevin J. Hamblett, et al as published in Clinical Cancer Research October 15, 2004.

58.Attached hereto as Appendix HAMBLETT01 is a true and correct copy of the MARC record for Clinical Cancer Research as held by the Penn State University Library. I secured this record myself from the library's public catalog. The MARC record contained within Appendix HAMBLETT01 accurately describes the title, publisher and ISSN number of Clinical Cancer Research. The Availability field present on page 5 of this record indicates the library's collection includes the October 15, 2004 issue of Clinical Cancer Research containing "Effects of Drug Loading on the Antitumor Activity of a Monoclonal Antibody Drug Conjugate".

59.Attached hereto as Appendix HAMBLETT02 is a true and correct copy of "Effects of Drug Loading on the Antitumor Activity of a Monoclonal Antibody Drug Conjugate" as published in Clinical Cancer Research as held by the Penn State University Library. These scans were secured from the

library's collection. In comparing Exhibit 2015 to Appendix HAMBLETT02, it is my determination that Exhibit 2015 is a true and correct copy of "Effects of Drug Loading on the Antitumor Activity of a Monoclonal Antibody Drug Conjugate" by Kevin J. Hamblett, et al as published in Clinical Cancer Research.

60.The 008 field of the MARC record in Appendix HAMBLETT01 indicates the date of record creation. The 008 field of Appendix HAMBLETT01 indicates the Penn State University Library first acquired Clinical Cancer Research as of March 8, 1995 and held the journal in perpetuity until the publication of "Effects of Drug Loading on the Antitumor Activity of a Monoclonal Antibody Drug Conjugate". Considering this information, it is my determination that Clinical Cancer Research October 15, 2004 and therefore "Effects of Drug Loading on the Antitumor Activity of a Monoclonal Antibody Drug Conjugate" was made available to the public shortly after its initial publication in October 15, 2004.

61.I have reviewed Exhibit 2016, "Site-specific conjugation of a cytotoxic drug to an antibody improves the therapeutic index" by Jagath R. Junutula, et al as published in Nature Biotechnology August 2008.

62. Attached hereto as Appendix JUNUTULA01 is a true and correct copy of the MARC record for Nature Biotechnology as held by the Penn State University Library. I secured this record myself from the library's public catalog. The MARC record contained within Appendix JUNUTULA01 accurately describes the title, publisher and ISSN number of Nature Biotechnology. The Showing Results field present on page 4 of this record indicates the library's collection includes the August 2008 issue of Nature Biotechnology containing "Site-specific conjugation of a cytotoxic drug to an antibody improves the therapeutic index".

63. Attached hereto as Appendix JUNUTULA02 is a true and correct copy of "Site-specific conjugation of a cytotoxic drug to an antibody improves the therapeutic index" as published in Nature Biotechnology as held by the Penn State University Library. This PDF was secured from the library's collection. In comparing Exhibit 2016 to Appendix JUNUTULA02, it is my determination that Exhibit 2016 is a true and correct copy of "Site-specific conjugation of a cytotoxic drug to an antibody improves the therapeutic index" by Jagath R. Junutula, et al as published in Nature Biotechnology.

64. The 008 field of the MARC record in Appendix JUNUTULA01 indicates the date of record creation. The 008 field of Appendix JUNUTULA01

indicates the Penn State University Library first acquired Nature Biotechnology as of August 5, 1999 and held the journal in perpetuity until the publication of "Site-specific conjugation of a cytotoxic drug to an antibody improves the therapeutic index". Considering this information, it is my determination that Nature Biotechnology August 2008 and therefore "Site-specific conjugation of a cytotoxic drug to an antibody improves the therapeutic index" was made available to the public shortly after its initial publication in August 2008.

65.I have reviewed Exhibit 2017, "Antibody-drug conjugates: Basic concepts, examples and future perspectives" by Giulio Casi, et al as published in Journal of Controlled Release July 20, 2012.

66.Attached hereto as Appendix CASI01 is a true and correct copy of the MARC record for Journal of Controlled Release as held by the Penn State University Library. I secured this record myself from the library's public catalog. The MARC record contained within Appendix CASI01 accurately describes the title, publisher and ISSN number of Journal of Controlled Release. The Showing Results field present on page 5 of this record indicates the library's collection includes the July 20, 2012 issue of Journal

of Controlled Release containing "Antibody-drug conjugates: Basic concepts, examples and future perspectives".

67. Attached hereto as Appendix CASI02 is a true and correct copy of "Antibody-drug conjugates: Basic concepts, examples and future perspectives" as published in Journal of Controlled Release as held by the Penn State University Library. This PDF was secured from the library's collection. In comparing Exhibit 2017 to Appendix CASI02, it is my determination that Exhibit 2017 is a true and correct copy of "Antibody-drug conjugates: Basic concepts, examples and future perspectives" by Giulio Casi, et al as published in Journal of Controlled Release.

68. The 008 field of the MARC record in Appendix CASI01 indicates the date of record creation. The 008 field of Appendix CASI01 indicates the Penn State University Library first acquired Journal of Controlled Release as of April 10, 1998 and held the journal in perpetuity until the publication of "Antibody-drug conjugates: Basic concepts, examples and future perspectives". Considering this information, it is my determination that Journal of Controlled Release July 20, 2012 and therefore "Antibody-drug conjugates: Basic concepts, examples and future perspectives" was made available to the public shortly after its initial publication in July 20, 2012.

69.I have reviewed Exhibit 2018, "Vinyl Sulfone Bifunctional Derivatives of DOTA Allow Sulfhydryl- or Amino-Directed Coupling to Antibodies. Conjugates Retains Immunoreactivity and Have Similar Biodistributions" by Lan Li, et al as published in Bioconjugate Chemistry January 2002.

70.Attached hereto as Appendix LI01 is a true and correct copy of the MARC record for Bioconjugate Chemistry as held by the Penn State University Library. I secured this record myself from the library's public catalog. The MARC record contained within Appendix LI01 accurately describes the title, publisher and ISSN number of Bioconjugate Chemistry. The Showing Results field present on page 3 of this record indicates the library's collection includes the January 2002 issue of Bioconjugate Chemistry containing "Vinyl Sulfone Bifunctional Derivatives of DOTA Allow Sulfhydryl- or Amino-Directed Coupling to Antibodies. Conjugates Retains Immunoreactivity and Have Similar Biodistributions".

71.Attached hereto as Appendix LI02 is a true and correct copy of "Vinyl Sulfone Bifunctional Derivatives of DOTA Allow Sulfhydryl- or Amino-Directed Coupling to Antibodies. Conjugates Retains Immunoreactivity and Have Similar Biodistributions" as published in Bioconjugate Chemistry as

held by the Penn State University Library. This PDF was secured from the library's collection. In comparing Exhibit 2018 to Appendix LI02, it is my determination that Exhibit 2018 is a true and correct copy of "Vinyl Sulfone Bifunctional Derivatives of DOTA Allow Sulfhydryl- or Amino-Directed Coupling to Antibodies. Conjugates Retains Immunoreactivity and Have Similar Biodistributions" by Lan Li, et al as published in Bioconjugate Chemistry.

72. The 008 field of the MARC record in Appendix LI01 indicates the date of record creation. The 008 field of Appendix LI01 indicates the Penn State University Library first acquired Bioconjugate Chemistry as of July 30, 1997 and held the journal in perpetuity until the publication of "Vinyl Sulfone Bifunctional Derivatives of DOTA Allow Sulfhydryl- or Amino-Directed Coupling to Antibodies. Conjugates Retains Immunoreactivity and Have Similar Biodistributions". Considering this information, it is my determination that Bioconjugate Chemistry January 2002 and therefore "Vinyl Sulfone Bifunctional Derivatives of DOTA Allow Sulfhydryl- or Amino-Directed Coupling to Antibodies. Conjugates Retains Immunoreactivity and Have Similar Biodistributions" was made available to the public shortly after its initial publication in January 2002.

73.I have reviewed Exhibit 2019, "Conjugate Additions of Nitroalkanes to Electron-Poor Alkenes: Recent Results" by Roberto Ballini, et al as published in Chemical Reviews March 2005.

74.Attached hereto as Appendix BALLINI01 is a true and correct copy of the MARC record for Chemical Reviews as held by the Carnegie Library of Pittsburgh. I secured this record myself from the library's public catalog. The MARC record contained within Appendix BALLINI01 accurately describes the title, publisher and ISSN number of Chemical Reviews. The Lib Has field present on page 3 of this record indicates the library's collection includes the March 2005 issue of Chemical Reviews containing "Conjugate Additions of Nitroalkanes to Electron-Poor Alkenes: Recent Results".

75.Attached hereto as Appendix BALLINI02 is a true and correct copy of "Conjugate Additions of Nitroalkanes to Electron-Poor Alkenes: Recent Results" as published in Chemical Reviews as held by the Carnegie Library of Pittsburgh. These scans were secured from the library's collection. In comparing Exhibit 2019 to Appendix BALLINI02, it is my determination that Exhibit 2019 is a true and correct copy of "Conjugate Additions of

Nitroalkanes to Electron-Poor Alkenes: Recent Results" by Roberto Ballini, et al as published in Chemical Reviews.

76.The 008 field of the MARC record in Appendix BALLINI01 indicates the date of record creation. The 008 field of Appendix BALLINI01 indicates the Carnegie Library of Pittsburgh first acquired Chemical Reviews as of August 17, 1975 and held the journal in perpetuity until the publication of "Conjugate Additions of Nitroalkanes to Electron-Poor Alkenes: Recent Results". Considering this information, it is my determination that Chemical Reviews March 2005 and therefore "Conjugate Additions of Nitroalkanes to Electron-Poor Alkenes: Recent Results" was made available to the public shortly after its initial publication in March 2005.

77.I have reviewed Exhibit 2020, "Immunoblotting and Immunodetection" by Sean Gallagher, et al as published in Current Protocols in Cell Biology September 2011.

78.Attached hereto as Appendix GALLGHER01 is a true and correct copy of the MARC record for Current Protocols in Cell Biology as held by the University of California Los Angeles Library. I secured this record myself from the library's public catalog. The MARC record contained within

Appendix GALLGHER01 accurately describes the title, publisher and ISSN number of Current Protocols in Cell Biology. The Online Access field present on page 2 of this record indicates the library's collection includes the September 2011 issue of Current Protocols in Cell Biology containing "Immunoblotting and Immunodetection".

79. Attached hereto as Appendix GALLGHER02 is a true and correct copy of "Immunoblotting and Immunodetection" as published in Current Protocols in Cell Biology as held by the University of California Los Angeles Library. This PDF was secured from the library's collection. In comparing Exhibit 2020 to Appendix GALLGHER02, it is my determination that Exhibit 2020 is a true and correct copy of "Immunoblotting and Immunodetection" by Sean Gallagher, et al as published in Current Protocols in Cell Biology.

80. The 008 field of the MARC record in Appendix GALLGHER01 indicates the date of record creation. The 008 field of Appendix GALLGHER01 indicates the University of California Los Angeles Library first acquired Current Protocols in Cell Biology as of November 1, 2001 and held the journal in perpetuity until the publication of "Immunoblotting and Immunodetection". Considering this information, it is my determination that Current Protocols in Cell Biology September 2011 and therefore

"Immunoblotting and Immunodetection" was made available to the public shortly after its initial publication in September 2011.

81.I have reviewed Exhibit 2030, "Semisynthetic Maytansine Analogues for the Targeted Treatment of Cancer" by Wayne C. Widdison, et al as published in Journal of Medicinal Chemistry July 13, 2006.

82.Attached hereto as Appendix WIDDISON01 is a true and correct copy of the MARC record for Journal of Medicinal Chemistry as held by the Penn State University Library. I secured this record myself from the library's public catalog. The MARC record contained within Appendix WIDDISON01 accurately describes the title, publisher and ISSN number of Journal of Medicinal Chemistry. The Showing Results field present on page 3 of this record indicates the library's collection includes the July 13, 2006 issue of Journal of Medicinal Chemistry containing "Semisynthetic Maytansine Analogues for the Targeted Treatment of Cancer".

83.Attached hereto as Appendix WIDDISON02 is a true and correct copy of "Semisynthetic Maytansine Analogues for the Targeted Treatment of Cancer" as published in Journal of Medicinal Chemistry as held by the Penn State University Library. This PDF was secured from the library's

collection. In comparing Exhibit 2030 to Appendix WIDDISON02, it is my determination that Exhibit 2030 is a true and correct copy of "Semisynthetic Maytansine Analogues for the Targeted Treatment of Cancer" by Wayne C. Widdison, et al as published in Journal of Medicinal Chemistry.

84.The 008 field of the MARC record in Appendix WIDDISON01 indicates the date of record creation. The 008 field of Appendix WIDDISON01 indicates the Penn State University Library first acquired Journal of Medicinal Chemistry as of July 14, 1998 and held the journal in perpetuity until the publication of "Semisynthetic Maytansine Analogues for the Targeted Treatment of Cancer". Considering this information, it is my determination that Journal of Medicinal Chemistry July 13, 2006 and therefore "Semisynthetic Maytansine Analogues for the Targeted Treatment of Cancer" was made available to the public shortly after its initial publication in July 13, 2006.

85.I have reviewed Exhibit 2041, a web page entitled "Citation Details" as hosted on the Springer Nature website. This page describes "Unusual binding sites for horseradish peroxidase on the surface of cultured and isolated mammalian cells" by W. Straus, et al as published in Histochemistry July 1986.

86. Attached hereto as Appendix STRAUS01 is a screen capture of a webpage entitled Citation Details as hosted on the Springer Nature website. I secured these screen captures myself from <https://citations.springernature.com/item?doi=10.1007/BF00493477>. In comparing Exhibit 2041 to Appendix STRAUS01, it is my determination that Exhibit 2041 is a true and correct copy of "Citation Details" as hosted on the Springer Nature website.

87. The website captured in Exhibit 2041 and Appendix STRAUS01 indicates "Unusual binding sites for horseradish peroxidase on the surface of cultured and isolated mammalian cells" by W. Straus, et al as published in Histochemistry July 1986 has been cited by 14 publications. The publication dates of these citations range from 1987 to 2014, indicating the paper's continuous public availability for more than 20 years after its initial publication.

88. I have reviewed Exhibit 2042, Dictionary of Science and Technology by S.M.H. Collin.

89. Attached hereto as Appendix COLLIN01 is a true and correct copy of the MARC record for Dictionary of Science and Technology as held by the

Penn State University Library. I secured this record myself from the library's public catalog. The MARC record contained within Appendix COLLIN01 accurately describes the title, author, publisher, and ISBN number of Dictionary of Science and Technology. In comparing Exhibit 2042 to Appendix COLLIN01, it is my determination that Exhibit 2042 is a true and correct copy of Dictionary of Science and Technology by S.M.H. Collin.

90.The 008 field of the MARC record in Appendix COLLIN01 indicates the date of record creation. The 008 field of Appendix COLLIN01 indicates the Penn State University Library first acquired Dictionary of Science and Technology as of August 9, 2007. Considering this information, it is my determination that Dictionary of Science and Technology was made available to the public shortly after its initial acquisition as of August 9, 2007.

91.I have reviewed Exhibit 2043, Encyclopedia of Chemistry by Don Rittner, et al.

92.Attached hereto as Appendix RITTNER01 is a true and correct copy of the MARC record for Encyclopedia of Chemistry as held by the Los Angeles

Public Library. I secured this record myself from the library's public catalog. The MARC record contained within Appendix RITTNER01 accurately describes the title, author, publisher, and ISBN number of Encyclopedia of Chemistry.

93. Attached hereto as Appendix RITTNER02 is a true and correct copy of Encyclopedia of Chemistry as held by the Los Angeles Public Library. These scans were secured from the library's collection. In comparing Exhibit 2043 to Appendix RITTNER02, it is my determination that Exhibit 2043 is a true and correct copy of Encyclopedia of Chemistry by Don Rittner, et al.

94. The 008 field of the MARC record in Appendix RITTNER01 indicates the date of record creation. The 008 field of Appendix RITTNER01 indicates the Los Angeles Public Library first acquired Encyclopedia of Chemistry as of May 12, 2004. Considering this information, it is my determination that Encyclopedia of Chemistry was made available to the public shortly after its initial acquisition as of May 12, 2004.

95. I have reviewed Exhibit 2044, Dictionary of Scientific and Technical Terms by McGraw-Hill.

96. Attached hereto as Appendix MCGRAW01 is a true and correct copy of the MARC record for Dictionary of Scientific and Technical Terms as held by the Penn State University Library. I secured this record myself from the library's public catalog. The MARC record contained within Appendix MCGRAW01 accurately describes the title, author, publisher, and ISBN number of Dictionary of Scientific and Technical Terms. In comparing Exhibit 2044 to Appendix MCGRAW01, it is my determination that Exhibit 2044 is a true and correct copy of Dictionary of Scientific and Technical Terms by McGraw-Hill.

97. The 008 field of the MARC record in Appendix MCGRAW01 indicates the date of record creation. The 008 field of Appendix MCGRAW01 indicates the Penn State University Library first acquired Dictionary of Scientific and Technical Terms as of June 19, 2002. Considering this information, it is my determination that Dictionary of Scientific and Technical Terms was made available to the public shortly after its initial acquisition as of June 19, 2002.

98. I have reviewed Exhibit 2045, Oxford Dictionary of Science by Oxford.

99. Attached hereto as Appendix OXFORD01 is a true and correct copy of the MARC record for Oxford Dictionary of Science as held by the Carnegie

Library of Pittsburgh. I secured this record myself from the library's public catalog. The MARC record contained within Appendix OXFORD01 accurately describes the title, author, publisher, and ISBN number of Oxford Dictionary of Science.

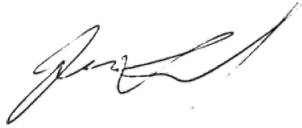
100. Attached hereto as Appendix OXFORD02 is a true and correct copy of Oxford Dictionary of Science as held by the Carnegie Library of Pittsburgh. These scans were secured from the library's collection. In comparing Exhibit 2045 to Appendix OXFORD02, it is my determination that Exhibit 2045 is a true and correct copy of Oxford Dictionary of Science by Oxford.

101. The 008 field of the MARC record in Appendix OXFORD01 indicates the date of record creation. The 008 field of Appendix OXFORD01 indicates the Carnegie Library of Pittsburgh first acquired Oxford Dictionary of Science as of May 1, 2010. Considering this information, it is my determination that Oxford Dictionary of Science was made available to the public shortly after its initial acquisition as of May 1, 2010.

102. I declare under penalty of perjury that the foregoing is true and correct. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to

be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Dated: 12/6/2024

A handwritten signature in black ink, appearing to read 'June Ann Munford', with a stylized flourish at the end.

June Ann Munford