

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FUSION PHARMACEUTICALS, INC.,
Petitioner,

v.

UNIVERSITÄT HEIDELBERG AND THE EUROPEAN ATOMIC ENERGY
COMMUNITY (EURATOM), REPRESENTED BY THE EUROPEAN
COMMISSION,
Patent Owners

Case No. IPR2023-00551
Patent No. 10,980,901 B2

PETITIONER'S UPDATED EXHIBIT LIST

EXHIBIT NO.	DESCRIPTION
1001	U.S. Patent No. 10,980,901 (“the ’901 patent”)
1002	Declaration of Dr. Rebecca Abergel, Ph.D.
1003	Curriculum Vitae of Dr. Rebecca Abergel, Ph.D.
1004	File History of U.S. Patent No. 10,980,901
1005	Marc A. Bjurlin, et al., <i>Imaging and evaluation of patients with high-risk prostate cancer</i> , 12 Nature Reviews Urology 617 (2015) (“Bjurlin”).
1006	Kristell Chatalic, et al., <i>²¹³Bi-labeled PSMA-targeting agents for alpha radionuclide therapy of prostate cancer</i> , 57 J. Nuclear Med. 137 (2016) (“Chatalic”).
1007	Emre Demirci, <i>⁶⁸Ga-PSMA PET/CT imaging of metastatic clear cell renal cell carcinoma</i> , 41 Eur. J. Nuclear Med. Molecular Imaging 1461 (2014) (“Demirci”).
1008	Catherine A. Foss, et al., <i>Radiolabeled Small-Molecule Ligands for Prostate-Specific Membrane Antigen: In vivo Imaging in Experimental Models of Prostate Cancer</i> , 11 Clinical Cancer Rsch. 4022 (2005) (“Foss”).
1009	Shawn Hillier, et al., <i>[¹³¹I] MIP-1375, a small molecule prostate-specific membrane antigen (PSMA) inhibitor for targeted therapy of prostate cancer (PCa)</i> , 52 J. Nuclear Med. 361 (2011) (“Hillier 2011”).
1010	Shawn Hillier, et al., <i>[¹³¹I] MIP-1466, a small molecule prostate-specific membrane antigen (PSMA) inhibitor for targeted radiotherapy of prostate cancer (PCa)</i> , 53 J. Nuclear Med. 170 (2012) (“Hillier 2012”).

EXHIBIT NO.	DESCRIPTION
1011	Joseph G. Jurcic, et. al., <i>Phase I Trial of Targeted Alpha-Particle Therapy with Actinium-225 (^{225}Ac)-Lintuzumab and Low-Dose Cytarabine (LDAC) in Patients Age 60 or Older with Untreated Acute Myeloid Leukemia (AML)</i> , 128 Blood 4050 (2016) (“Jurcic”).
1012	Susan J. Mandel, et al., <i>Superiority of Iodine-123 Compared with Iodine-131 Scanning for Thyroid Remnants in Patients with Differentiated Thyroid Cancer</i> , 26 Clinical Nuclear Med. 6 (2001) (“Mandel”).
1013	Michael R. McDevitt, et al., <i>Tumor Therapy with Targeted Atomic Nanogenerators</i> , 294 Science 1537 (2001) (“McDevitt 2001”).
1014	Michael R. McDevitt, et al., <i>Design and synthesis of ^{225}Ac radioimmunopharmaceuticals</i> , 57 Applied Radiation & Isotopes 841 (2002) (“McDevitt 2002”).
1015	Matthias Miederer, et al., <i>Preclinical Evaluation of the α-Particle Generator Nuclide ^{225}Ac for Somatostatin Receptor Radiotherapy of Neuroendocrine Tumors</i> , 14 Clinical Cancer Rsch. 3555 (2008) (“Miederer 2008a”).
1016	Dianne E. Milenic & Martin W. Brechbiel, <i>Targeting of Radio-Isotopes for Cancer Therapy</i> , 3 Cancer Biology & Therapy 361 (2004) (“Milenic”).
1017	George Sgourous, et al., <i>MIRD Pamphlet No. 22 (Abridged): Radiobiology and Dosimetry of α-Particle Emitters for Targeted Radionuclide Therapy</i> , 51 J. Nuclear Med. 311 (2010) (“MIRD Pamphlet”).
1018	Natsuko Normura, et al., <i>Prostate specific membrane antigen (PSMA) expression in primary gliomas and breast cancer brain metastases</i> , 14 Cancer Cell Int’l 1 (2014) (“Nomura”).

EXHIBIT NO.	DESCRIPTION
1019	Martin G. Pomper, et al., <i>¹¹C-MCG: Synthesis, Uptake Selectivity, and Primate PET of a Probe for Glutamate Carboxypeptidase II (NAALADase)</i> , 1 Molecular Imaging 96 (2002) (“Pomper”).
1020	Justin R. Hubenak, et al., <i>Mechanisms of injury to normal tissue after radiotherapy: a review</i> , 133 Plastic Reconstructive Surgery 49 (2014) (“Hubenak”).
1021	Jeffery S. Ross, et al., <i>Correlation of Primary Tumor Prostate-Specific Membrane Antigen Expression with Disease Recurrence in Prostate Cancer</i> , 9 Clinical Cancer Rsch. 6357 (2003) (“Ross”).
1022	David A. Scheinberg & Michael R. McDevitt, <i>Actinium-225 in targeted alpha-particle therapeutic applications</i> , 4 Current Radiopharmceuticals 306 (2011) (“Scheinberg”).
1023	David A. Silver, et al., <i>Prostate-specific Membrane Antigen Expression in Normal and Malignant Human Tissues</i> , 3 Clinical Cancer Rsch. 81 (1997) (“Silver”).
1024	Baris Turkbey, et al., <i>Multiparametric Prostate Magnetic Resonance Imaging in the Evaluation of Prostate Cancer</i> , 66 CA: Cancer J. for Clinicians 326 (2016) (“Turkbey”).
1025	U.S. Patent No. 10,471,160 (“the ’160 patent”).
1026	U.S. Patent No. 10,398,791 (“the ’791 patent”).
1027	Martina Weineisen, et al., <i>Synthesis and preclinical evaluation of DOTAGA-conjugated PSMA ligands for functional imaging and endoradiotherapy of prostate cancer</i> , 4 EJNMMI Rsch. 1 (2014) (“Weineisen 2014”).

EXHIBIT NO.	DESCRIPTION
1028	Martina Weineisen, et al., <i>⁶⁸Ga-and ¹⁷⁷Lu-labeled PSMA I&T: Optimization of a PSMA-Targeted Theranostic Concept and First Proof-of-Concept Human Studies</i> , 56 J. Nuclear Med. 1169 (2015) (“Weineisen 2015”).
1029	Alla G. Wernicke, et al., <i>Prostate-specific membrane antigen expression in tumor-associated vasculature of breast cancers</i> , 122 APMIS 482 (2014) (“Wernicke”).
1030	Matthias Miederer, et al., <i>Realizing the potential of the Actinium-225 radionuclide generator in targeted alpha particle therapy applications</i> , 60 Advanced Drug Delivery Revs. 1371 (2008) (“Miederer 2008b”).
1031	Clemens Kratochwil, et al., <i>Ac-225-DOTATOC - an empiric dose finding for alpha particle emitter based radionuclide therapy of neuroendocrine tumors</i> , 56 J. Nuclear Med. 1232 (2015) (“Kratochwil”).
1032	Randall D. Knight, <i>Physics For Scientists and Engineers</i> 1369–70 (Adam Black et al. eds., vol. 5 2005) (“Knight”).
1033	Liang Zhao, et al., <i>Clinical pharmacology considerations in biologics development</i> , 33 Acta Pharmacologica Sinica 1339 (2012) (“Zhao”).
1034	U.S. Dep’t Health & Hum. Servs., <i>Anthropometric Reference Data for Children and Adults: United States, 2015–2018 Series 3</i> , 9 (2021) (“HHS”).
1035	Nerissa Viola-Villegas & Robert P. Doyle, <i>The coordination chemistry of 1,4,7,10-tetraazacyclododecane-N,N',N'',N'''-tetraacetic acid (H₄DOTA): Structural overview and analyses on structure–stability relationships</i> , 253 Coordination Chemistry Reviews 1906 (2009) (“Viola-Villegas”).

EXHIBIT NO.	DESCRIPTION
1036	Nima Sharifi, et al., <i>Androgen Deprivation Therapy for Prostate Cancer</i> , 294 JAMA 238 (2005) (“Sharifi”).
1037	Nat’l Cancer Inst., <i>SEER Cancer Stat Facts: Prostate Cancer</i> , seer.cancer.gov, https://seer.cancer.gov/statfacts/html/prost.html (last visited Jan. 31, 2023) (“NCI”).
1038	Sharmila Banerjee, et al., <i>Lutetium-177 Therapeutic Radiopharmaceuticals: Linking Chemistry, Radiochemistry, and Practical Applications</i> , 115 Chem. Revs. 2934 (2015) (“Banerjee”).
1039	Arundhati Ghosh & Warren D.W. Heston, <i>Tumor Target Prostate Specific Membrane Antigen (PSMA) and its Regulation in Prostate Cancer</i> , 91 J. Cellular Biochemistry 528 (2004) (“Ghosh”).
1040	Materials Considered by Dr. Abergel.
1041	Confidential License Agreement [Parties and Board Only]
1042	Confidential Settlement Agreement [Parties and Board Only]

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the Petitioner's Updated Exhibit List was served on March 1, 2024 via email to the Patent Owners by serving the correspondence email addresses of record as follows:

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Respectfully Submitted,

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