
From: Brausa, Adam R. <ABrausa@mofo.com>
Sent: Friday, May 3, 2024 2:40 PM
To: Laura Fairneny; Hillier, Drew Alan
Cc: QE - Samsung Bioepis; MYL_REG_IPR@rmmslegal.com; Lora Green; Franklin Chu; rcerwinski@geminilaw.com; azalcenstein@geminilaw.com; bmorris@geminilaw.com; Durie, Daralyn J.; Davis, Kira A; Weires, Rebecca; Regeneron-MoFo-IPR; Wilk, Matthew M.; Cobb, Jeremy; Caine, David A.
Subject: RE: IPR2023-00884: Additional Discovery

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL from abrausa@mofo.com]



Laura,

Drew is out with some appointments today, and I'm not sure of his availability, so I can respond. Regeneron is fully cooperating and is attempting to actually meet and confer. Samsung on the other hand refuses to provide any specific justification for its untimely requests for additional discovery. To date, Samsung has not offered any explanation for why its request for numerous trial exhibits is "necessary in the interest of justice" as articulated in *Garmin Int'l, Inc. v. Cuozzo Speed Tech. L.L.C.*, IPR2012-00001, Paper 26 (P.T.A.B. Mar. 5, 2013), or why it waited so long to seek this additional discovery. As such, Regeneron opposes Samsung's proposed motion for leave to seek additional discovery. We can be available on Tuesday or Thursday of next week from 11-5 ET for a call with the Board. Thanks.

Regards,
Adam

Adam Brausa

abrausa@mofo.com
T: +1 (415) 268-6053
M: +1 (773) 426-9492

Morrison Foerster
425 Market St.
San Francisco, CA 94105

**MORRISON
FOERSTER**

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From: Laura Fairneny <laurafairneny@quinnemanuel.com>
Sent: Friday, May 3, 2024 12:30 PM
To: Hillier, Drew Alan <DHillier@mofo.com>
Cc: QE - Samsung Bioepis <qe-samsungbioepis@quinnemanuel.com>; MYL_REG_IPR@rmmslegal.com; Lora Green

<lgreen@geminilaw.com>; Franklin Chu <fchu@geminilaw.com>; rcerwinski@geminilaw.com;
azalcenstein@geminilaw.com; bmorris@geminilaw.com; Brausa, Adam R. <ABrausa@mofo.com>; Durie, Daralyn J.
<DDurie@mofo.com>; Davis, Kira A <KiraDavis@mofo.com>; Weires, Rebecca <RWeires@mofo.com>; Regeneron-
MoFo-IPR <Regeneron-MoFo-IPR@mofo.com>; Wilk, Matthew M. <Matthew.Wilk@arnoldporter.com>; Cobb, Jeremy
<Jeremy.Cobb@arnoldporter.com>; Caine, David A. <David.Caine@arnoldporter.com>
Subject: RE: IPR2023-00884: Additional Discovery

External Email

Counsel,

We have tried to resolve this request for additional discovery without requiring the Board's involvement, but Regeneron is not cooperating in that process. We plan to email the Board to request leave to file a motion for the additional discovery and raise Regeneron's refusal to meet and confer in a timely manner.

Please send us times you are available for a conference call with the Board next week.

Regards,
Laura

From: Laura Fairneny
Sent: Friday, May 3, 2024 12:16 PM
To: Hillier, Drew Alan <DHillier@mofo.com>
Cc: QE - Samsung Bioepis <qe-samsungbioepis@quinnemanuel.com>; MYL_REG_IPR@rmmslegal.com; Lora Green <lgreen@geminilaw.com>; Franklin Chu <fchu@geminilaw.com>; rcerwinski@geminilaw.com; azalcenstein@geminilaw.com; bmorris@geminilaw.com; Brausa, Adam R. <ABrausa@mofo.com>; Durie, Daralyn J. <DDurie@mofo.com>; Davis, Kira A <KiraDavis@mofo.com>; Weires, Rebecca <RWeires@mofo.com>; Regeneron-MoFo-IPR <Regeneron-MoFo-IPR@mofo.com>; Wilk, Matthew M. <Matthew.Wilk@arnoldporter.com>; Cobb, Jeremy <Jeremy.Cobb@arnoldporter.com>; Caine, David A. <David.Caine@arnoldporter.com>
Subject: RE: IPR2023-00884: Additional Discovery

Drew,

We cannot wait that long. I'm happy to discuss with another member of your team at the proposed times today, talk to you on Saturday, or get Regeneron's position by email. This cannot be drawn out by Regeneron any longer.

Regards,
Laura

From: Hillier, Drew Alan <DHillier@mofo.com>
Sent: Friday, May 3, 2024 12:13 PM
To: Laura Fairneny <laurafairneny@quinnemanuel.com>
Cc: QE - Samsung Bioepis <qe-samsungbioepis@quinnemanuel.com>; MYL_REG_IPR@rmmslegal.com; Lora Green <lgreen@geminilaw.com>; Franklin Chu <fchu@geminilaw.com>; rcerwinski@geminilaw.com; azalcenstein@geminilaw.com; bmorris@geminilaw.com; Brausa, Adam R. <ABrausa@mofo.com>; Durie, Daralyn J. <DDurie@mofo.com>; Davis, Kira A <KiraDavis@mofo.com>; Weires, Rebecca <RWeires@mofo.com>; Regeneron-MoFo-IPR <Regeneron-MoFo-IPR@mofo.com>; Wilk, Matthew M. <Matthew.Wilk@arnoldporter.com>; Cobb, Jeremy <Jeremy.Cobb@arnoldporter.com>; Caine, David A. <David.Caine@arnoldporter.com>
Subject: RE: IPR2023-00884: Additional Discovery

Laura,

I am not available today. Are you available at 10:00 a.m. on Tuesday? We can use the dial-in that I circulated below.

Thank you,

Drew

Drew Alan Hillier

Associate

DHillier@mofo.com

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M +1 (858) 252-5131

**MORRISON
FOERSTER**

From: Laura Fairneny <laurafairneny@quinnemanuel.com>

Sent: Friday, May 3, 2024 8:04 AM

To: Hillier, Drew Alan <DHillier@mofo.com>

Cc: QE - Samsung Bioepis <qe-samsungbioepis@quinnemanuel.com>; MYL_REG_IPR@rmmslegal.com; Lora Green <lgreen@geminilaw.com>; Franklin Chu <fchu@geminilaw.com>; rcerwinski@geminilaw.com; azalcenstein@geminilaw.com; bmorris@geminilaw.com; Brausa, Adam R. <ABrausa@mofo.com>; Durie, Daralyn J. <DDurie@mofo.com>; Davis, Kira A <KiraDavis@mofo.com>; Weires, Rebecca <RWeires@mofo.com>; Regeneron-MoFo-IPR <Regeneron-MoFo-IPR@mofo.com>; Wilk, Matthew M. <Matthew.Wilk@arnoldporter.com>; Cobb, Jeremy <Jeremy.Cobb@arnoldporter.com>; Caine, David A. <David.Caine@arnoldporter.com>

Subject: RE: IPR2023-00884: Additional Discovery

External Email

Drew,

Please let me know your availability today.

Regards,
Laura

From: Laura Fairneny

Sent: Thursday, May 2, 2024 5:19 PM

To: Hillier, Drew Alan <DHillier@mofo.com>

Cc: QE - Samsung Bioepis <qe-samsungbioepis@quinnemanuel.com>; MYL_REG_IPR@rmmslegal.com; Lora Green <lgreen@geminilaw.com>; Franklin Chu <fchu@geminilaw.com>; rcerwinski@geminilaw.com; azalcenstein@geminilaw.com; bmorris@geminilaw.com; Brausa, Adam R. <ABrausa@mofo.com>; Durie, Daralyn J. <DDurie@mofo.com>; Davis, Kira A <KiraDavis@mofo.com>; Weires, Rebecca <RWeires@mofo.com>; Regeneron-

MoFo-IPR <Regeneron-MoFo-IPR@mofo.com>; Wilk, Matthew M. <Matthew.Wilk@arnoldporter.com>; Cobb, Jeremy <Jeremy.Cobb@arnoldporter.com>; Caine, David A. <David.Caine@arnoldporter.com>
Subject: Re: IPR2023-00884: Additional Discovery

Drew,

I can also make myself available tomorrow from 2:30-5pm ET.

Regards,
Laura

On May 2, 2024, at 5:08 PM, Hillier, Drew Alan <DHillier@mofo.com> wrote:

[EXTERNAL EMAIL from dhillier@mofo.com]

Laura,

We do think it makes sense to wait until we hear from Mylan on whether Mylan objects. I am not available to speak tomorrow before 9:30 a.m. PT. If 10:00 a.m. PT does not work for you on Tuesday, please propose some additional times.

Thank you,

Drew

Drew Alan Hillier
Associate
DHillier@mofo.com
T +1 (858) 314-7711
M +1 (858) 252-5131

<image001.png>

From: Laura Fairneny <laurafairneny@quinnemanuel.com>
Sent: Thursday, May 2, 2024 12:27 PM
To: Hillier, Drew Alan <DHillier@mofo.com>
Cc: QE - Samsung Bioepis <qe-samsungbioepis@quinnemanuel.com>; 'MYL_REG_IPR@rmmslegal.com' <MYL_REG_IPR@rmmslegal.com>; 'Lora Green' <lgreen@geminilaw.com>; 'Franklin Chu' <fchu@geminilaw.com>; 'rcerwinski@geminilaw.com' <rcerwinski@geminilaw.com>; 'azalcenstein@geminilaw.com' <azalcenstein@geminilaw.com>; 'bmorris@geminilaw.com' <bmorris@geminilaw.com>; Brausa, Adam R. <ABrausa@mofo.com>; Durie, Daralyn J. <DDurie@mofo.com>; Davis, Kira A <KiraDavis@mofo.com>; Weires, Rebecca <RWeires@mofo.com>; Regeneron-MoFo-IPR <Regeneron-MoFo-IPR@mofo.com>; Wilk, Matthew M. <Matthew.Wilk@arnoldporter.com>; Cobb, Jeremy <Jeremy.Cobb@arnoldporter.com>; Caine, David A. <David.Caine@arnoldporter.com>
Subject: RE: IPR2023-00884: Additional Discovery

External Email

Drew,

I don't think Mylan's review needs to hold up our discussions. I remain available to talk today or can talk before 12:30 pm ET tomorrow.

Regards,
Laura

From: Hillier, Drew Alan <DHillier@mofo.com>
Sent: Thursday, May 2, 2024 2:59 PM
To: Laura Fairneny <laurafairneny@quinnemanuel.com>
Cc: QE - Samsung Bioepis <qe-samsungbioepis@quinnemanuel.com>; 'MYL_REG_IPR@rmmslegal.com' <MYL_REG_IPR@rmmslegal.com>; 'Lora Green' <lgreen@geminilaw.com>; 'Franklin Chu' <fchu@geminilaw.com>; 'rcerwinski@geminilaw.com' <rcerwinski@geminilaw.com>; 'azalcenstein@geminilaw.com' <azalcenstein@geminilaw.com>; 'bmorris@geminilaw.com' <bmorris@geminilaw.com>; Brausa, Adam R. <ABrausa@mofo.com>; Durie, Daralyn J. <DDurie@mofo.com>; Davis, Kira A <KiraDavis@mofo.com>; Weires, Rebecca <RWeires@mofo.com>; Regeneron-MoFo-IPR <Regeneron-MoFo-IPR@mofo.com>; Wilk, Matthew M. <Matthew.Wilk@arnoldporter.com>; Cobb, Jeremy <Jeremy.Cobb@arnoldporter.com>; Caine, David A. <David.Caine@arnoldporter.com>
Subject: RE: IPR2023-00884: Additional Discovery

[EXTERNAL EMAIL from dhillier@mofo.com]

Laura,

As Mylan indicated in the attached email, Mylan “need[s] at least another day” before it can confirm whether it objects to the production. We also need more time to communicate with Regeneron’s district court counsel because this implicates the district court litigation. Let’s plan to discuss on Tuesday to make sure all the parties have time to make progress on resolving these issues without motion practice. Are you available at 10:00 a.m. PT? If so, we can use this dial-in information:

Microsoft Teams [Need help?](#)
[Join the meeting now](#)
Meeting ID: 242 612 177 303
Passcode: twwe6f

Dial-in by phone
[+1 628-212-0656](tel:+16282120656), [681972533#](tel:+1681972533) United States, San Francisco
[Find a local number](#)
Phone conference ID: 681 972 533#
For organizers: [Meeting options](#) | [Reset dial-in PIN](#)

Best,

Drew

Drew Alan Hillier

Associate

DHillier@mofo.com

T +1 (858) 314-7711

M +1 (858) 252-5131

<image001.png>

From: Laura Fairneny <laurafairneny@quinnemanuel.com>

Sent: Thursday, May 2, 2024 11:22 AM

To: Hillier, Drew Alan <DHillier@mofo.com>

Cc: QE - Samsung Bioepis <qe-samsungbioepis@quinnemanuel.com>; 'MYL_REG_IPR@rmmslegal.com' <MYL_REG_IPR@rmmslegal.com>; 'Lora Green' <lgreen@geminilaw.com>; 'Franklin Chu' <fchu@geminilaw.com>; 'rcerwinski@geminilaw.com' <rcerwinski@geminilaw.com>; 'azalcenstein@geminilaw.com' <azalcenstein@geminilaw.com>; 'bmorris@geminilaw.com' <bmorris@geminilaw.com>; Brausa, Adam R. <ABrausa@mofo.com>; Durie, Daralyn J. <DDurie@mofo.com>; Davis, Kira A <KiraDavis@mofo.com>; Weires, Rebecca <RWeires@mofo.com>; Regeneron-MoFo-IPR <Regeneron-MoFo-IPR@mofo.com>; Wilk, Matthew M. <Matthew.Wilk@arnoldporter.com>; Cobb, Jeremy <Jeremy.Cobb@arnoldporter.com>; Caine, David A. <David.Caine@arnoldporter.com>

Subject: RE: IPR2023-00884: Additional Discovery

External Email

Drew,

I disagree with many of your characterizations of the parties' discussions on this issue. For example, I never said SB "wanted discovery about the '601 patent," but said I didn't understand how Regeneron thought it could redact testimony and exhibits it deemed relevant to only the '572 patent. Likewise, I've already explained that your request in bullet three of your email below is not a productive exercise conducive to working towards resolution of this issue given the substantial amount of overlap between the subject matter of Dr. Yancopoulos's and Ms. Chu's testimony here as compared to their testimony in the Mylan Litigations based on the publicly available portions we have been able to review.

Given that I have already responded to your other items, let's meet and confer today at 3:45 p.m. ET.

Regards,
Laura

From: Hillier, Drew Alan <DHillier@mofo.com>

Sent: Thursday, May 2, 2024 12:27 PM

To: Laura Fairneny <laurafairneny@quinnemanuel.com>

Cc: QE - Samsung Bioepis <qe-samsungbioepis@quinnemanuel.com>; 'MYL_REG_IPR@rmmslegal.com' <MYL_REG_IPR@rmmslegal.com>; 'Lora Green' <lgreen@geminilaw.com>; 'Franklin Chu' <fchu@geminilaw.com>; 'rcerwinski@geminilaw.com' <rcerwinski@geminilaw.com>; 'azalcenstein@geminilaw.com' <azalcenstein@geminilaw.com>; 'bmorris@geminilaw.com' <bmorris@geminilaw.com>; Brausa, Adam R. <ABrausa@mofo.com>; Durie, Daralyn J.

<DDurie@mofo.com>; Davis, Kira A <KiraDavis@mofo.com>; Weires, Rebecca <RWeires@mofo.com>; Regeneron-MoFo-IPR <Regeneron-MoFo-IPR@mofo.com>; Wilk, Matthew M. <Matthew.Wilk@arnoldporter.com>; Cobb, Jeremy <Jeremy.Cobb@arnoldporter.com>; Caine, David A. <David.Caine@arnoldporter.com>
Subject: RE: IPR2023-00884: Additional Discovery

[EXTERNAL EMAIL from dhillier@mofo.com]

Laura,

Although the parties were not able to complete the meet and confer, Regeneron writes to summarize today's call regarding Samsung's request for additional discovery.

1. Regeneron confirmed that it was providing a higher-resolution printout of the PowerPoint presentation previously filed as Ex. 2007 and a version of Ex. 2011 without a trial exhibit stamp that had obscured some text on the cover page.
1. Regeneron asked if Samsung would agree to limit its request for additional discovery to an identifiable subject matter that is tailored to the relevant issues regarding the '572 patent. Samsung stated that it also wanted discovery about the '601 patent. Although Samsung would not agree on the call to limit the requests to certain topics, or even agree to limit the requests to the '572 patent, you stated that you would discuss with your team and let us know your position.
1. Regeneron asked why Samsung decided to wait approximately two months after the filing of the Patent Owner's Response and after the depositions of Dr. Yancopoulos and Ms. Chu to seek this discovery. Although Regeneron explained that Samsung's request for the discovery was allegedly "[b]ased on the recent depositions of Karen Chu and George Yancopoulos in this proceeding," Samsung stated that it would not identify any specific testimony. Regeneron understands, therefore, that there is nothing in the recent depositions to give rise to this request for additional discovery. If that understanding is mistaken, Regeneron asks Samsung for the third time to identify the relevant testimony by page and line number so that we can have a meaningful meet and confer.
1. We discussed protective order issues. As you know, Mylan's positions on the protective order in the Mylan district court litigation has resulted in motion practice. Out of an abundance of caution, we asked if Samsung had confirmed whether Mylan objected to Regeneron producing the requested information in light of the district court protective order. Samsung stated that it did not know Mylan's position, although it agreed to ask Mylan. Regeneron also asked whether Samsung would be open to a two-tier protective order for these documents. You agreed to discuss with your team.

We are available to meet and confer at 12:45 p.m. PT / 3:45 p.m. ET. However, if Samsung is not able to provide a written response on the items above by tomorrow at 11:00 a.m. PT, we should wait to speak until after you respond so that our call is productive.

Sincerely,

Drew

Drew Alan Hillier

Associate
DHillier@mofo.com
T +1 (858) 314-7711
M +1 (858) 252-5131

<image001.png>

From: Laura Fairneny <laurafairneny@quinnemanuel.com>
Sent: Wednesday, May 1, 2024 6:13 PM
To: Hillier, Drew Alan <DHillier@mofo.com>
Cc: QE - Samsung Bioepis <qe-samsungbioepis@quinnemanuel.com>; 'MYL_REG_IPR@rmmslegal.com' <MYL_REG_IPR@rmmslegal.com>; 'Lora Green' <lgreen@geminilaw.com>; 'Franklin Chu' <fchu@geminilaw.com>; 'rcerwinski@geminilaw.com' <rcerwinski@geminilaw.com>; 'azalcenstein@geminilaw.com' <azalcenstein@geminilaw.com>; 'bmorris@geminilaw.com' <bmorris@geminilaw.com>; Brausa, Adam R. <ABrausa@mofo.com>; Durie, Daralyn J. <DDurie@mofo.com>; Davis, Kira A <KiraDavis@mofo.com>; Weires, Rebecca <RWeires@mofo.com>; Regeneron-MoFo-IPR <Regeneron-MoFo-IPR@mofo.com>; Wilk, Matthew M. <Matthew.Wilk@arnoldporter.com>; Cobb, Jeremy <Jeremy.Cobb@arnoldporter.com>; Caine, David A. <David.Caine@arnoldporter.com>
Subject: RE: IPR2023-00884: Additional Discovery

External Email

Drew,

I appreciate the meet and confer earlier today and write to respond to the requests you made during our discussion.

First, we will confirm with Mylan that it does not object to the requested production. As explained on the call, we do not understand why this step is necessary given that the requested materials relate to Regeneron's fact witnesses and documents, but we will nevertheless make this request of Mylan in the interest of reaching agreement on these issues.

Second, SB agrees not to seek any additional deposition of Dr. Yancopoulos or Ms. Chu based on the production of the additional discovery assuming Regeneron does not submit any further declaration from these witnesses.

Third, SB agrees that documents produced on an Outside Counsel's Eyes Only basis in the Mylan Litigation can be designated as Outside Counsel Eye's Only in this IPR.

Finally, we do not agree to allow Regeneron to redact the requested materials for relevance before production. As explained on the call, it's not clear how Regeneron would be able to determine what is relevant versus what is not, and performing the redactions only requires more burden and delay in producing the materials.

As discussed on the call, we need to resolve whether the parties can reach an agreement or are at an impasse by tomorrow. Please let me know your availability to meet and confer between 11:00 am to 5:00 pm ET.

Regards,
Laura

From: Hillier, Drew Alan <DHillier@mofo.com>
Sent: Tuesday, April 30, 2024 11:12 AM
To: Laura Fairneny <laurafairneny@quinnemanuel.com>
Cc: QE - Samsung Bioepis <qe-samsungbioepis@quinnemanuel.com>; 'MYL_REG_IPR@rmmslegal.com' <MYL_REG_IPR@rmmslegal.com>; 'Lora Green' <lgreen@geminilaw.com>; 'Franklin Chu' <fchu@geminilaw.com>; 'rcerwinski@geminilaw.com' <rcerwinski@geminilaw.com>; 'azalcenstein@geminilaw.com' <azalcenstein@geminilaw.com>; 'bmorris@geminilaw.com' <bmorris@geminilaw.com>; Brausa, Adam R. <ABrausa@mofo.com>; Durie, Daralyn J. <DDurie@mofo.com>; Davis, Kira A <KiraDavis@mofo.com>; Weires, Rebecca <RWeires@mofo.com>; Regeneron-MoFo-IPR <Regeneron-MoFo-IPR@mofo.com>; Wilk, Matthew M. <Matthew.Wilk@arnoldporter.com>; Cobb, Jeremy <Jeremy.Cobb@arnoldporter.com>; Caine, David A. <David.Caine@arnoldporter.com>
Subject: RE: IPR2023-00884: Additional Discovery

[EXTERNAL EMAIL from dhillier@mofo.com]

Laura,

Thank you for the email. Before we have a call, as previously requested, please identify the specific transcript testimony that Samsung believes justifies this discovery request and explain the alleged relevance of the exhibits. We need this information so that we have a meaningful call. We are available May 1 or May 2 at 2:00 p.m. PT.

Samsung was undoubtedly aware of the requested documents before the depositions in this proceeding of Dr. Yancopoulos and Ms. Chu. The subject of Dr. Yancopoulos's and Ms. Chu's testimony was also apparent in their declarations which were filed some time ago. If Samsung wanted to examine whether past statements were consistent, Samsung should have asked the witnesses about those statements at their depositions. Therefore, it is not clear to us why Samsung waited until after the depositions to request these materials.

We will serve a higher-resolution printout of the PowerPoint presentation previously filed as Ex. 2007 and a version of Ex. 2011 without a trial exhibit stamp that had obscured some text on the cover page.

Best,

Drew

Drew Alan Hillier
Associate
DHillier@mofo.com
T +1 (858) 314-7711
M +1 (858) 252-5131

<image001.png>

From: Laura Fairneny <laurafairneny@quinnemanuel.com>
Sent: Friday, April 26, 2024 2:02 PM

To: Hillier, Drew Alan <DHillier@mofo.com>
Cc: QE - Samsung Bioepis <qe-samsungbioepis@quinnemanuel.com>; 'MYL_REG_IPR@rmmslegal.com' <MYL_REG_IPR@rmmslegal.com>; 'Lora Green' <lgreen@geminilaw.com>; 'Franklin Chu' <fchu@geminilaw.com>; 'rcerwinski@geminilaw.com' <rcerwinski@geminilaw.com>; 'azalcenstein@geminilaw.com' <azalcenstein@geminilaw.com>; 'bmorris@geminilaw.com' <bmorris@geminilaw.com>; Brausa, Adam R. <ABrausa@mofo.com>; Durie, Daralyn J. <DDurie@mofo.com>; Davis, Kira A <KiraDavis@mofo.com>; Weires, Rebecca <RWeires@mofo.com>; Regeneron-MoFo-IPR <Regeneron-MoFo-IPR@mofo.com>; Wilk, Matthew M. <Matthew.Wilk@arnoldporter.com>; Cobb, Jeremy <Jeremy.Cobb@arnoldporter.com>; Caine, David A. <David.Caine@arnoldporter.com>
Subject: RE: IPR2023-00884: Additional Discovery

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Drew,

Upon review of the trial transcript in the Mylan Litigation and the available deposition designations at that same trial from Ms. Chu, it appears that Dr. Yancopoulos and Ms. Chu provided testimony in the Mylan Litigation on subject matter that is substantially similar to their depositions in this IPR. SB should be allowed to examine Dr. Yancopoulos's and Ms. Chu's prior testimony in the Mylan Litigation for consistency with their IPR declarations and testimony. The exhibits cited in that prior testimony are necessary for us to fully evaluate and effectively use any statements therein.

As to Exhibits 2007 and 2011, at his deposition, Dr. Yancopoulos testified that there appeared to be information missing or obscured in both exhibits. See Yancopoulos Dep. Tr. at 16:13-17:3, 227:23-228:10.

We are available to meet and confer on Monday from 2-5pm ET or on Tuesday from 10am-2pm ET.

Regards,
Laura

From: Hillier, Drew Alan <DHillier@mofo.com>
Sent: Thursday, April 25, 2024 5:01 PM
To: Laura Fairney <laurafairney@quinnemanuel.com>
Cc: QE - Samsung Bioepis <qe-samsungbioepis@quinnemanuel.com>; 'MYL_REG_IPR@rmmslegal.com' <MYL_REG_IPR@rmmslegal.com>; 'Lora Green' <lgreen@geminilaw.com>; 'Franklin Chu' <fchu@geminilaw.com>; 'rcerwinski@geminilaw.com' <rcerwinski@geminilaw.com>; 'azalcenstein@geminilaw.com' <azalcenstein@geminilaw.com>; 'bmorris@geminilaw.com' <bmorris@geminilaw.com>; Brausa, Adam R. <ABrausa@mofo.com>; Durie, Daralyn J. <DDurie@mofo.com>; Davis, Kira A <KiraDavis@mofo.com>; Weires, Rebecca <RWeires@mofo.com>; Regeneron-MoFo-IPR <Regeneron-MoFo-IPR@mofo.com>; Wilk, Matthew M. <Matthew.Wilk@arnoldporter.com>; Cobb, Jeremy <Jeremy.Cobb@arnoldporter.com>; Caine, David A. <David.Caine@arnoldporter.com>
Subject: RE: IPR2023-00884: Additional Discovery

[EXTERNAL EMAIL from dhillier@mofo.com]

Laura,

We are looking into providing higher-resolution copies of Exhibits 2007 and 2011, although we are not aware of any “missing” information.

Regarding “the collaboration agreement between Bayer and Regeneron,” we believe copies are equally available to Samsung at [SEC.gov](https://www.sec.gov).

Regeneron would like to meet and confer to understand the remainder of Samsung’s request. Before we schedule a call, please identify the specific testimony in the depositions of Karen Chu and George Yancopoulos on which Samsung is relying to attempt to justify the additional discovery. For each requested exhibit, please explain the alleged relevance so that we can have a meaningful meet and confer.

Sincerely,

Drew

Drew Alan Hillier

Associate

DHillier@mofo.com

T +1 (858) 314-7711

M +1 (858) 252-5131

<image001.png>

From: Laura Fairneny <laurafairneny@quinnemanuel.com>

Sent: Tuesday, April 16, 2024 1:41 PM

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Subject: IPR2023-00884: Additional Discovery

External Email

Counsel,

Based on the recent depositions of Karen Chu and George Yancopoulos in this proceeding, Petitioner requests the following limited additional discovery pursuant to 37 C.F.R. § 42.51(b)(2):

1. The deposition transcript of Karen Chu from *Regeneron Pharmaceuticals, Inc. v. Mylan Pharmaceuticals, Inc.*, Case No. 22-cv-61-TSK (N.D.W. Va.) (“Mylan Litigation”) and all exhibits thereto;
2. The deposition transcript of George Yancopoulos from the Mylan Litigation and all exhibits thereto;
3. The trial exhibits from the Mylan Litigation cited in the trial testimony of Karen Chu and/or George Yancopoulos, including: PTX 0001, PTX 0003, PTX 0080, PTX 0188, PTX 0304, PTX 0311, PTX 0491, PTX 0686, PTX 0932, PTX 1028C, PTX 1170, PTX 3131, PTX 3133, PTX 3150, PTX 3151, PTX 3167, PTX 3168, PTX 3187, PTX 3188, PTX 3216, PTX 3332, PTX 3333, PDX 1-1, PDX 1-2, PDX 3.001, PDX 3.002, PDX 3.004, PDX 3-0311-B, PDX 932-C, DTX 0019, DTX 0212, DTX 0216, DTX 0227, DTX 0228, DTX 0902, DTX 0913, DTX 0915, DTX 0916, DTX 2053, DTX 2053A, DTX 2730, DTX 2745, DTX 3196, DTX 4070, DTX 4957, DTX 5073, DTX 5082, DTX 5385, DTX 7001, DTX 7212, DTX 7272, DTX 8127, DTX 8180, DTX 8190, DTX 9002, DTX 9003, DTX 9005, DTX 9006;
4. The following trial exhibits from the Mylan Litigation cited in the Court’s Memorandum Opinion and Order Following Bench Trial (ECF No. 692 in the Mylan Litigation): DTX 0213, DTX 0220, DTX 0222, DTX 0226, DTX 0229, DTX 0230, DTX 0232, DTX 0234;
5. The collaboration agreement between Bayer and Regeneron, and any amendments thereto; and
6. Corrected copies of Exs. 2007 and 2011 that includes missing text and figures (*see, e.g.*, Ex. 2007 at pp. 39, 48 and Ex. 2011 at p. 1).

Please let us know if Patent Owner agrees to make this limited production of requested documents.

Regards,

Laura Fairneny
Partner

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