

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PADAGIS ISRAEL PHARMACEUTICALS LIMITED;
PADAGIS US LLC; AND PADAGIS, LLC,

Petitioner,

v.

BAUSCH HEALTH US, LLC,

Patent Owner.

IPR2023-01114
U.S. Patent No. 11,311,482

Before EMANUEL T. MINES, *Trial Paralegal*

**DECLARATION OF THOMAS P. STEINDLER IN SUPPORT OF PATENT
OWNER'S MOTION FOR ADMISSION *PRO HAC VICE***

I, Thomas P. Steindler, declare and state as follows:

1. I was first admitted to the bar in 1985.
2. I have been lead counsel in patent cases for the past 25 years.
3. I am a member in good standing of the Bar of the District of Columbia and is admitted to practice in District of Columbia Court of Appeals, U.S. Court of Appeals 4th Circuit, U.S. Court of Appeals 9th Circuit, U.S. District Court District of Columbia, U.S. Court of Appeals 8th Circuit, U.S. Court of Appeals DC Circuit, U.S. Court of Appeals 7th Circuit, U.S. Court of Appeals 6th Circuit, U.S. Court of Appeals 11th Circuit, U.S. Court of Federal Claims, U.S. Court of Appeals for Federal Circuit, Supreme Court of the United States, U.S. Court of Appeals 1st Circuit and U.S. District Court for the Eastern District of Texas. I have also been admitted *pro hac vice* in the U.S. District Courts for the Districts of New Jersey and Delaware, as well as the Northern District of California.
4. I have never been suspended or disbarred from practice, nor had any application for admission to practice denied, nor any sanctions or contempt citations imposed by any court or administrative body.
5. I have read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in part 42 of 37 C.F.R.

6. I agree to be subject to the USPTO Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 *et seq.* and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

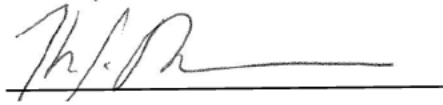
7. I have not applied to appear *pro hac vice* in any proceeding before the Office in the last three (3) years.

8. I have great familiarity with the subject matter at issue in this proceeding. In particular, I am lead counsel for Patent Owner Bausch Health Ireland Limited in the related district court proceeding involving the same U.S. Patent No. 11,311,482 which is the subject of the instant petition. *Bausch Health Ireland Ltd. et al. v. Padagis Israel Pharmaceuticals Ltd. et. al.*, Civil Action No. 22-4248 (D.N.J.) (cons.) (filed June 24, 2022). I was intimately involved in preparing, *inter alia*, Bausch Health's responsive validity contentions, which largely overlap with the grounds of invalidity asserted in the instant Petition. I also served as lead counsel in *Bausch Health Ireland Ltd. v. Padagis Israel Pharms. Ltd.*, Civil Action No. 20-5426 (D.N.J.) (cons.) (filed May 1, 2020), the prior litigation between the parties that is discussed in Patent Owner's Preliminary Response. *E.g.*, Patent Owner's Preliminary Response, Paper No. 9 at 27–28 (October 24, 2023).

9. 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 are made with the knowledge

that willful false statements and the like are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Dated: November 9, 2023

A handwritten signature in black ink, appearing to read 'T. P. Steindler', is written over a horizontal line.

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