

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 CHRISTOPHER M. BRUNO IN SUPPORT OF
PATENT OWNER'S MOTION FOR ADMISSION *PRO HAC VICE***

I, Christopher M. Bruno, declare and state as follows:

1. I was first admitted to the bar in 2010.
2. I have served as counsel in patent cases for the past 13 years.
3. I am a member in good standing of the Bars of the District of Columbia

and the State of New York. I am also admitted to practice in the Supreme Court of the United States, the United States Court of Appeals for the Sixth Circuit, the United States Court of Appeals for the Seventh Circuit, the United States Court of Appeals for the Ninth Circuit, the United States Court of Appeals for the Federal Circuit, the United States District Court for the District of Columbia, the United States District Court for the Southern District of New York, the United States District Court for the District of Columbia, and the United States Tax Court. I have also been admitted *pro hac vice* in at least the United States District Court for the Central District of California, the United States District Court for the Southern District of California, the United States District Court for the District of Delaware, the United States District Court for the Western District of Michigan, the United States District Court for the District of New Jersey, the United States District Court for the Middle District of Tennessee, the United States District Court for the Southern District of Texas, the United States District Court for the Western District of Washington, and the United States District Court for the Northern District of West Virginia.

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. I served as counsel for Patent Owner Bausch Health Ireland Limited in the related district court proceeding involving the same patent that is the subject of this *inter partes* review proceeding, U.S. Patent No. 11,311,482. *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, among other things, Bausch Health Ireland Limited's responses to Padagis's invalidity contentions, which largely overlap with the grounds of invalidity asserted here. I also served as counsel for Patent Owner Bausch Health Ireland Limited in a trial against Padagis relating to patents involving similar subject

matter. *See Bausch Health Ireland Ltd. v. Padagis Israel Pharms. Ltd.*, No. 20-5426 (D.N.J. mem. op. Dec. 1, 2022).

9. I hereby declare that all statements made herein of my own knowledge are true to the best of my knowledge 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, reading "Christopher Bruno", is positioned above a solid horizontal line.

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