

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

**DR. REDDY'S LABORATORIES, S.A. AND
DR. REDDY'S LABORATORIES, INC.,**
Petitioner,

v.

EYE THERAPIES, LLC,
Patent Owner.

Case No.: IPR2024-00467

U.S. Patent No.: 11,833,245

**PETITIONERS' UNOPPOSED MOTION FOR
PRO HAC VICE ADMISSION OF TIMOTHY J. BEAVERS
UNDER 37 C.F.R. § 42.10(c)**

Pursuant to 37 C.F.R. § 42.10(c), Petitioners Dr. Reddy's Laboratories S.A. and Dr. Reddy's Laboratories, Inc. respectfully request *pro hac vice* admission of Timothy J. Beavers in this proceeding, IPR2024-00467, regarding U.S. Patent No. 11,833,245 ("the '245 patent").

I. THE REQUEST IS TIMELY

Pursuant to the Board's "Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response," dated February 15, 2024 (Paper No. 3), authorizing the parties to file motions for *pro hac vice* admission under 37 C.F.R. § 42.10(c), Petitioners Dr. Reddy's Laboratories S.A. and Dr. Reddy's Laboratories, Inc. respectfully request that the Board allow Timothy J. Beavers to appear *pro hac vice* on its behalf in this proceeding. Patent Owner does not oppose this motion.

II. REASONS THE REQUESTED RELIEF SHOULD BE GRANTED

As set forth in the Statement of Material Facts below, and as required by 37 C.F.R. § 42.10(c), Petitioner has demonstrated good cause to admit Mr. Beavers *pro hac vice* in this proceeding. In particular, Petitioner's lead counsel is a registered practitioner, and Mr. Beavers is an experienced litigating attorney having an established familiarity with the subject matter at issue in this proceeding.

Furthermore, this motion is being filed more than twenty one days after service of the petition; includes a statement of facts showing good cause for the

Board to recognize Mr. Beavers *pro hac vice*; and is being filed concurrently with Exhibit 1038, the Declaration of Timothy J. Beavers in Support of Motion for *Pro Hac Vice* Admission under 37 C.F.R. § 42.10(c) (“Beavers Decl.”).

III. STATEMENT OF MATERIAL FACTS

1. 37 C.F.R. § 42.10(c) provides that “[t]he Board may recognize counsel *pro hac vice* during a proceeding upon a showing of good cause, subject to the condition that lead counsel be a registered practitioner and to any other conditions as the Board may impose. For example, where the lead counsel is a registered practitioner, a motion to appear *pro hac vice* by counsel who is not a registered practitioner may be granted upon showing that counsel is an experienced litigating attorney and has an established legal familiarity with the subject matter at issue in the proceeding.”

2. Linnea P. Cipriano, lead counsel for Petitioners Dr. Reddy’s Laboratories S.A. and Dr. Reddy’s Laboratories, Inc., is a registered practitioner holding Registration No. 67,729.

3. As set forth in the Beavers Decl., Mr. Beavers is an experienced litigating attorney. Specifically, Mr. Beavers has over four years of experience representing clients in patent litigations in United States District Courts, appearing *pro hac vice*. (Beavers Decl., ¶ 2).

4. Mr. Beavers also has an established familiarity with the precise subject matter at issue in this proceeding. In the course of this representation, she has developed a strong familiarity with the '245 patent, its prosecution history, the general subject matter to which the '245 patent is directed, and the prior art references relied upon by Petitioner and Patent Owner in support of their respective pleadings. (Beavers Decl., ¶ 6). Additionally, Mr. Beavers has thoroughly reviewed the Petition, the Patent Owner's Response, and accompanying Exhibits submitted in this proceeding. (*Id.*).

5. Mr. Beavers has attested to the each of the requirements set forth in paragraph 2(b)(i)-(viii) of the "Order Authorizing Motion for Pro Hac Vice Admission" in IPR 2013-00639, Paper 7, at 3. (Beavers Decl., ¶¶ 4-12).

IV. CONCLUSION

In view of the foregoing, Petitioner respectfully submits that the requirements of 37 C.F.R. § 42.10(c) have been satisfied, and requests an Order permitting Timothy J. Beavers to appear *pro hac vice* on its behalf in this proceeding.

Dated: January 14, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Linnea P. Cipriano, certify that I caused to be served a true and correct copy of the foregoing **PETITIONERS' UNOPPOSED MOTION FOR PRO HAC VICE ADMISSION OF TIMOTHY J. BEAVERS UNDER 37 C.F.R. § 42.10(c) and EXHIBIT 1038, THE DECLARATION OF TIMOTHY J. BEAVERS IN SUPPORT OF MOTION FOR *PRO HAC VICE* ADMISSION UNDER 37 C.F.R. § 42.10(c)** by email, as follows:

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