UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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DR. REDDY'S LABORATORIES, S.A. AND
DR. REDDY'S LABORATORIES, INC.,
Petitioners,
v.

EYE THERAPIES, LLC,
Patent Owner.

_____

Case No.: IPR2024-00467

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

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DECLARATION OF TIMOTHY BEAVERS
IN SUPPORT OF MOTION FOR *PRO HAC VICE* ADMISSION
UNDER 37 C.F.R. § 42.10(c)

I, Timothy Beavers, hereby declare and swear as follows:

1. I am an Associate with the law firm of Goodwin Procter LLP, 620 Eighth Avenue, New York, NY 10018.

2. I am an experienced patent litigation attorney. I have been litigating patent cases for over 4 years. I have been practicing law since 2021 and have experience litigating patent infringement cases in district courts across the United States.

3. My experience in patent litigation matters includes examining non-expert and expert witnesses, engaging in motion practice, participating in Markman proceedings and patent dispositive motion proceedings, and representing clients in other patent-related hearings and pleadings concerning, inter alia, patent validity and infringement issues.

4. I am a member in good standing of the State of New York (bar no. 5834635) and am admitted to practice *pro hac vice* before the United States District Court for the District of New Jersey, the District of Massachusetts, and the District of Delaware.

5. In the last three years, I have not applied for *pro hac vice* admission before the Patent Trial and Appeal Board.

6. I have substantial familiarity with the subject matter at issue in this proceeding. Petitioner has challenged U.S. Patent No. 11,833,245 ("the '245

patent"), the patent at issue in this proceeding. I have 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 in support of their Papers. Furthermore, I have thoroughly reviewed the Petition and accompanying Exhibits submitted in this proceeding.

7. I have never been suspended or disbarred from practice before any court or administrative body.

8. I have never had an application for admission to practice before any court or administrative body denied.

9. I have never been subject to any sanction or contempt citation imposed by any court or administrative body.

10. 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 37 C.F.R. part 42.

11. 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).

12. I declare under penalty of perjury that the foregoing is true and correct. I further 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 were made with the knowledge that willful

false statements and the like so made are punishable by fine or imprisonment, or both, under section 1001 of title 18 of the United States Code, and that such willful false statements may jeopardize the validity of the application or any patent issued thereon.

Date: January 14, 2025

/Timothy Beavers/
Timothy Beavers