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.,
Petitioners,
v.

EYE THERAPIES, LLC,
Patent Owner.

_____

Case No.: IPR2024-00467

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

_____

DECLARATION OF ELAINE H. BLAIS
IN SUPPORT OF NOTICE OF INTENT TO DESIGNATE
PROVISIONALLY RECOGNIZED PTAB ATTORNEY AS BACK-UP
COUNSEL UNDER 37 C.F.R. § 42.10(c)

I, Elaine H. Blais, hereby declare and swear as follows:

1. I am a partner with the law firm of Goodwin Procter LLP, 100 Northern Avenue, Boston, MA 02210.

2. I am an experienced patent litigation attorney. I have been litigating patent cases for over almost 30 years. I have been practicing law since 1995 and have extensive experience litigating patent infringement cases in district courts across the United States.

3. My experience in patent litigation matters includes patent jury trials, including opening statements, closing arguments, presentation of non-expert and expert-testimony, arguing Markman hearings, patent summary judgment proceedings, and other patent-related hearings and pleadings concerning, inter alia, patent validity and infringement issues. I have also represented clients' appeals before the Court of Appeals for the Federal Circuit resulting from cases I tried and in other cases. My experience also includes the representation of a client in numerous IPRs before the Patent Trial and Appeal Board.

4. I am a member in good standing of the State Bar of Massachusetts, and am an inactive member of the Illinois and Ohio State Bars. I am also admitted to practice before the United States District Court for Northern District of California, United States District Court for Northern District of Illinois, United States District Court for the District of Massachusetts, United States District Court for Northern

District of Ohio, United States District Court for Eastern District of Texas, as well as the United States Supreme Court, the International Trade Commission, and the United States Court of Appeals for the First Circuit, Fourth Circuit, and Federal Circuit.

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.

Executed on January 14, 2025

Respectfully submitted,

By: */Elaine H. Blais/*
Elaine H. Blais

GOODWIN PROCTER LLP