Paper No. 60
Filed: March 4, 2025

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 IPR2024-00467
U.S. Patent No. 11,833,245

PATENT OWNER'S OBJECTIONS TO PETITIONERS' EXHIBITS

Pursuant to 27 C.F.R. § 42.64(b)(1), Patent Owner hereby submits the following objections to certain exhibits submitted by Petitioners. Patent Owner's objections apply equally to Petitioners' reliance on these exhibits in any subsequently filed documents. Patent Owner objects to the following exhibits.

Exhibit No.	**Description**
1053	Deposition Transcript of Robert Noecker, dated November 13, 2022. IPR2022-00142 ("Noecker '742 IPR Depo Transcript")
1129	Declaration of Robert J. Noecker, MD, MBA, Case No. IPR2022-00142 ("Noecker '742 Declaration"); Filed under seal
1171	Expert Declaration of Ivan T. Hofmann in Support of Petitioner Reply in IPR2022-00142 — Filed under seal
1188	Deposition Transcript of John Ferris, dated November 2, 2022, IPR2022-00142 – filed under seal
1198	Declaration of John C. Jarosz, IPR2022-00142—Filed under seal
1199	Deposition Transcript of John C. Jarosz, dated November 11, 2022. IPR2022-00142

Patent Owner objects to Exhibits 1053, 1129, 1171, 1188, 1198, and 1199 under Federal Rules of Evidence ("FRE") 802 as containing hearsay and/or hearsay within hearsay. To the extent Petitioners rely on the content of these exhibits for the truth of the matter asserted, Patent Owner objects to such content as inadmissible hearsay and/or hearsay within hearsay that does not fall under any exceptions.

Patent Owner also objects to Exhibits 1053, 1129, 1171, 1188, 1198, and 1199 as irrelevant, or in the alternative, prejudicial, confusing, and a waste of time under FRE 401, 402, and 403 because any probative value is substantially outweighed by

needlessly presenting cumulative evidence. Petitioners do not cite to Exhibits 1171, 1188, 1198, and 1199, thus, these exhibits in particular have minuscule probative value that is substantially outweighed by unfair prejudice, confusion, waste of time, and needless presentation of cumulative evidence. FRE 401-403.

Respectfully submitted,

Dated: March 4, 2025

/Bryan C. Diner/
Bryan C. Diner, Reg. No. 32,409
Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **Patent Owner's Objections to Petitioners' Exhibits** was served on March 4, 2025, via email directed to counsel of record for the Petitioners at the following:

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Dated: March 4, 2025

By: /Geneva Eaddy/
Geneva Eaddy
Case Manager
Finnegan, Henderson, Farabow,