

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
Patent 11,833,245

JOINT MOTION TO TERMINATE
PURSUANT TO 35 U.S.C. § 317 AND 37 C.F.R. § 42.74

I. STATEMENT OF THE PRECISE RELIEF REQUESTED

Pursuant to 35 U.S.C. § 317 and 37 C.F.R. § 42.74, Petitioners Dr. Reddy's Laboratories S.A. and Dr. Reddy's Laboratories, Inc. ("Petitioners") and Patent Owner Eye Therapies, LLC ("Patent Owner") (collectively, "the Parties") jointly move to terminate IPR2024-00467 in light of the parties' settlement of their disputes regarding U.S. Patent No. 11,833,245.

The disputes involving the patent challenged in this proceeding have been resolved and the Parties have, accordingly, reached agreement to terminate this proceeding. On July 9, 2025, the Parties notified the Board that the disputes involving the patent challenged in this proceeding have been resolved. On that basis, the Parties requested permission to file a Joint Motion to Terminate IPR2024-00467. On July 10, 2025, the Board authorized the Parties, via email, to file this Joint Motion to Terminate.

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(b), filed separately herewith as Exhibit 2282 is a true copy of the written Settlement Agreement resolving the disputes in the above-captioned inter partes review proceeding. The Parties are filing concurrently herewith, as a separate submission, a Joint Request to Treat the Settlement Agreement as Business Confidential and to Keep Separate, pursuant to 36 U.S.C. § 317(b). The Parties request that the Agreement be treated as business confidential information and be kept separate from the files of the involved

patent, and be made available only to the Federal Government agencies on written request, or to any person on showing of good cause under 35 U.S.C. § 317 and 37 C.F.R. § 42.74(c). The Parties certify that there are no other collateral agreements or understandings, oral or written, between the parties made in connection with, or in contemplation of, the termination of this proceeding. 35 U.S.C. § 317(b).

II. STATEMENT OF REASONS FOR THE RELIEF REQUESTED

Termination of this proceeding is appropriate because the Board has not yet “decided the merits of the proceeding.” *See* Patent Trial and Appeal Board Consolidated Trial Practice Guide at 86 (November 21, 2019); *see also AM General LLC v. Uusi, LLC*, IPR2016-01050, Paper 44 (Nov. 7, 2017) (terminating an IPR after the oral hearing); *Lam Rsch. Corp. v. Daniel L. Flamm*, IPR2015-01764, IPR2015-01767, IPR2015-01768, Paper 27 (Dec. 15, 2016) (same); *Hydrite Chemical Co. v. Solenis Techs., L.P.*, IPR2015-01586, Paper 38, IPR2015-01592, Paper 39 (Nov. 25, 2016) (same); *Clio USA, Inc. v. The Procter & Gamble Co.*, IPR2013-00438, Paper 57 (Oct. 31, 2014) (same).

The disputes involving the patent challenged in this proceeding have been resolved. Maintaining this proceeding in the absence of Petitioners would contradict the Board’s policy of terminating proceedings once the Parties have resolved their dispute. *See* Patent Trial and Appeal Board Consolidated Trial Practice Guide at 86 (“There are strong public policy reasons to favor settlement between the parties to a

proceeding . . . The Board expects that a proceeding will terminate after the filing of a settlement agreement.”). It would also contradict the Congressional goal to establish a more efficient and streamlined patent system that limits unnecessary and counterproductive litigation costs. *See AM General LLC*, IPR2016-01050, Paper 44 at 2 (“These proceedings are at a late stage of the trial. However, the Board has not yet entered final written decisions on the merits . . . Generally, the Board expects that a proceeding will terminate after the filing of a settlement agreement.”); *Hydrite Chemical Co.*, IPR2015-01586, Paper 38 at 3-4, IPR2015-01592, Paper 39 at 3-4 (“We are persuaded that the parties’ disputes are settled completely and, under these circumstances, the public policy favoring settlement outweighs the increased public interest in final written decisions at this late stage in these proceedings.”).

Moreover, “the Board has not yet decided the merits of the proceeding or entered a final written decision.” *See Nvidia Corp. v. Advanced Cluster Systems, Inc.*, IPR2021-00075, Paper 15 at 2 (June 30, 2021) (terminating after institution); *see also Nuonosys, Inc. v. RRT Holdings, LLC*, IPR2020-01706, Paper 15 at 2 (July 7, 2021) (terminating proceedings because “[a]lthough we instituted trial, no other briefing has occurred. We have not yet decided the merits of the proceeding, and a final written decision has not been entered. Notwithstanding that the proceeding has moved beyond the preliminary stage, the Parties have shown adequately that the termination of the proceeding is appropriate”).

Therefore, Petitioners and Patent Owner respectfully and jointly request termination of the above-referenced proceeding.

Dated: July 11, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Joint Motion to Terminate Pursuant to 35 U.S.C. § 317 and 37 C.F.R. § 42.74 was served on July 11, 2025, via email directed to counsel of record for the Petitioners at the following:

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Patent 11,833,245

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