

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 REQUEST TO FILE SETTLEMENT AGREEMENT AS BUSINESS
CONFIDENTIAL AND TO KEEP IT SEPARATE FROM PATENT FILES**

Pursuant to 35 U.S.C. § 317(b), 37 C.F.R. § 42.74(c), and the Board's authorization on July 10, 2025, 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 request that the confidential Settlement Agreement (Ex. 2282) referenced in the concurrently-filed Joint Motion to Terminate the Proceedings be filed as business confidential information. The Parties further jointly request that the confidential Settlement Agreement be kept separate from the files of the patent involved in this inter partes review and be made available only on the showing of good cause or to Federal Government agencies on a written request.

Dated: July 11, 2025

Respectfully submitted,

By: /Bryan C. Diner/
Bryan C. Diner, Lead Counsel
Reg. No. 32,409
Justin J. Hasford, Back-up Counsel
Reg. No. 62,180
Joshua L. Goldberg, Back-up Counsel
Reg. No. 59,369
Matthew J. Luneack, Back-up Counsel
(*Pro Hac Vice*)
Kassandra M. Officer, Back-up Counsel
Reg. No. 74,083
Christina Ji-Hye Yang, Back-up Counsel
Reg. No. 79,103
Ryan V. McDonnell, Back-up Counsel

By: /Linnea Cipriano/
Linnea Cipriano (Reg. No. 67,729)
Goodwin Procter LLP
620 Eighth Avenue
New York, NY 10018
Phone: (212) 813-8800
Fax: (212) 355-3333
lcipriano@goodwinlaw.com

Counsel for Petitioners

Reg. No. 76,982
Finnegan, Henderson, Farabow, Garrett
& Dunner, L.L.P.
901 New York Ave. NW
Washington, DC 20001-4413
(202) 408-4000

M. David Weingarten, Back-up Counsel
Reg. No. 54,533
Finnegan, Henderson, Farabow, Garrett
& Dunner, L.L.P.
271 17th Street, NW, Suite 1400
Atlanta, GA 30363-6209
(404) 653-6457

Ryan P. O'Quinn, Back-up Counsel
Reg. No. 67,191
Finnegan, Henderson, Farabow, Garrett
& Dunner, L.L.P.
1875 Explorer Street, Suite 800
Reston, VA 20190-6023
(571) 203-2426

Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Joint Request to File Settlement Agreement as Business Confidential and to Keep It Separate from Patent Files was served on July 11, 2025, via email directed to counsel of record for the Petitioners at the following:

Linnea P. Cipriano
Timothy J. Beavers
Goodwin Procter LLP
620 Eighth Avenue
New York, NY 10018
lcipriano@goodwinlaw.com
TBeavers@goodwinlaw.com

Elaine Herrmann Blais
Robert Frederickson III
Alexandra Lu
Anna Zhou
Goodwin Procter LLP
100 Northern Avenue
Boston, MA 02210
EBlais@goodwinlaw.com
RFrederickson@goodwinlaw.com
ALu@goodwinlaw.com
AZhou@goodwinlaw.com

Christopher Cassella
Goodwin Procter LLP
1900 N Street N.W.
Washington, DC 20036
CCassella@goodwinlaw.com
extDG-Brimonidine@goodwinlaw.com

Case IPR2024-00467

Patent 11,833,245

Dated: July 11, 2025

By: /Geneva Eaddy/

Geneva Eaddy

Case Manager

Finnegan, Henderson, Farabow,

Garrett & Dunner, LLP