

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.: IPR2024-00563

U.S. Patent No.: 11,596,600

**DECLARATION OF ROBERT FREDERICKSON III
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, Robert Frederickson III, 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 18 years. I have been practicing law since 2007 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 admitted to practice before the United States District Court for the District of Massachusetts, United States District Court for the Eastern District of Texas, and the United States Court of Appeals for the First Circuit and the Federal Circuit.

5. In the last three years, I have applied for and been granted *pro hac vice* admission before the Patent Trial and Appeal Board in *Slayback Pharma LLC v. Eye Therapies, LLC*, IPR2022-00142 and *Slayback Pharma LLC v. Eye Therapies, LLC*, IPR2022-00146. My notice of intent to appear *pro hac vice* in *Dr. Reddy's Laboratories S.A. and Dr. Reddy's Laboratories, Inc. v. Eye Therapies, LLC*, IPR2024-00467, remains pending.

6. I have substantial familiarity with the subject matter at issue in this proceeding. Petitioner has challenged U.S. Patent No. 11,596,600 ("the '600 patent"), the patent at issue in this proceeding. I have developed a strong familiarity with the '600 patent, its prosecution history, the general subject matter to which the '600 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. Two initial applications seeking my admission *pro hac vice* filed in IPR2019-00328 and IPR2019-00329 were denied without prejudice due to procedural defects in the accompany declarations. I was admitted *pro hac vice* in those matters upon submitting corrected declarations. Otherwise, no application of

mine for admission to practice before any court or administrative body has ever been 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 23, 2025

Respectfully submitted,

By: /Robert Frederickson III/
Robert Frederickson III
GOODWIN PROCTER LLP