

**From:** [Trials](#)  
**To:** [Cipriano, Linnea P](#); [Trials](#)  
**Cc:** [Diner, Bryan](#); [Hasford, Justin](#); [Goldberg, Joshua](#); [Officer, Cassandra](#); [Yang, Christina Ji-Hye](#); [McDonnell, Ryan](#); [Luneack, Matthew](#); [Weingarten, M. David](#); [O'Quinn, Ryan](#); [extDG-Brimonidine](#)  
**Subject:** RE: IPR2024-00467 & IPR2024-00563  
**Date:** Friday, March 28, 2025 9:17:32 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)

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Counsel,

Petitioner's unopposed request to substitute Mr. Ivan Hofmann with Mr. Anthony Masztek in IPR2024-00467 and IPR2024-00563, as outlined in the email below, is granted.

No conference is needed at this time.

Regards,

Andrew Kellogg,  
Deputy Chief Clerk, Trials  
Patent Trial and Appeal Board  
USPTO  
[andrew.kellogg@uspto.gov](mailto:andrew.kellogg@uspto.gov)  
(571) 272-5366

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**From:** Cipriano, Linnea P <LCipriano@goodwinlaw.com>  
**Sent:** Friday, March 28, 2025 8:19 AM  
**To:** Trials <Trials@USPTO.GOV>  
**Cc:** Diner, Bryan <bryan.diner@finnegan.com>; Hasford, Justin <Justin.Hasford@finnegan.com>; Goldberg, Joshua <Joshua.Goldberg@finnegan.com>; Officer, Cassandra <Kassandra.Officer@finnegan.com>; Yang, Christina Ji-Hye <Christina.Yang@finnegan.com>; McDonnell, Ryan <Ryan.McDonnell@finnegan.com>; Luneack, Matthew <Matthew.Luneack@finnegan.com>; Weingarten, M. David <M.David.Weingarten@finnegan.com>; O'Quinn, Ryan <Ryan.O'Quinn@finnegan.com>; extDG-Brimonidine <extDG-Brimonidine@goodwinlaw.com>  
**Subject:** IPR2024-00467 & IPR2024-00563

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Dear Honorable Board,

I am lead counsel for Petitioner in the above captioned matters. Petitioners request permission to substitute their expert Mr. Ivan Hofmann with another expert, Mr. Anthony Masztek, in both IPR2024-00467 and IPR2024-00563. Mr. Hofmann submitted an expert declaration in support of Petitioners' Replies in these proceedings, filed as Ex. 1162. Since signing those declarations, Mr. Hofmann has experienced significant medical issues and is now unavailable for deposition. Mr. Masztek, who worked with Mr. Hofmann on his analysis of the issues in these proceedings, has agreed to adopt the opinions set forth in Mr. Hofmann's declarations and sit for deposition. To document this substitution, Petitioners request permission to file substitute declarations from Mr. Masztek that are identical to the declarations of Mr. Hofmann, except that they will include Mr. Masztek's qualifications. Petitioners also request permission to file copies of Mr. Masztek's CV as exhibits.

Petitioners conferred with Patent Owner regarding this substitution, and Patent Owner does not oppose. The parties have agreed that Mr. Masztek will be deposed on April 4, and the parties have agreed to stipulate that Due Date 3 will be extended by three days to April 11.

To the extent that a teleconference would be helpful, the parties are available at the following dates/times:

- Friday (3/28) 12pm-4pm
- Monday (3/31) 9am-1pm
- Tuesday (4/1) 9am-1pm
- Wednesday (4/2) 1pm-4pm

Regards,

**Linnea P. Cipriano**  
*she/her/hers*



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