

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ABBOTT DIABETES CARE INC.,
Petitioner,

v.

DEXCOM, INC.,
Patent Owner.

Case IPR2024-00859
U.S. Patent No. 11,510,625

DECLARATION OF JULIA CASTELLANO

Abbott Diabetes v. Dexcom
IPR2024-00859
EXHIBIT 2011

I, Julia Castellano, declare:

1. I am a Legal Assistant with the law firm of Klarquist Sparkman, LLP, attorneys for Patent Owner Dexcom, Inc. (“Patent Owner” or “Dexcom”). I have personal knowledge of the matters described herein, and if called to testify, I could and would testify competently thereto.

2. I make this declaration in support Patent Owner’s Preliminary Response Pursuant to 37 C.F.R. § 42.107.

3. I have prepared documents comparing the written text of Section VII (“Overview of the Prior Art”) and Section VIII (“The Asserted Grounds of Unpatentability”) of Petitioner Abbott Diabetes Care Inc.’s Petition for *Inter Partes* Review of U.S. Patent No. 11,510,625 Under 35 U.S.C. §§ 311-319 and 37 C.F.R. § 42.100 *et seq.* (“Petition”) (Dkt. 1) with the Declaration of Dr. Cameron Riviere, Ph.D. (“Riviere Decl.”) (Ex. 1004). I understand that those documents are being filed in the above-captioned proceeding as Exhibits 2008 and 2009, respectively.

4. To prepare the comparison documents for each section to be compared (Section VII and VIII, respectively), I first converted the Petition and the Riviere Decl. from pdf format to Microsoft Word (.docx file format) and then deleted sections other than the sections to be compared.

5. I deleted page breaks in the newly converted Word documents to avoid unnecessary formatting redlines when running Microsoft Word’s Compare feature.

6. To run the Compare feature in Microsoft Word, I selected “Compare” and updated the settings to “Ignore Formatting” and uploaded the Petition as the original document and the Riviere Decl. as the revised document. I then selected “Compare,” which created a new Word document showing detected changes between the two input documents in redline.

7. I limited the comparisons to only non-image text portions by rejecting detected changes to the images in the new Word document. I did this because the new Word document created by the Compare tool showed redlined changes for every image in the two input documents even where such images appeared to be the same.

8. I saved the new Word document reflecting the comparison of written text to my computer and printed the document to PDF format.

9. Additionally, I have prepared documents comparing the written description portions of U.S. Patent Pub. No. 2016/0331284 (Ex. 1007) *with* PCT Appl. No. WO 2016/183493A1 and U.S. Patent Pub. No. 22020/0178899 (Ex. 1008) *with* European Patent Appl. No. EP3632314A1 by copying such portions into separate Word documents and running Microsoft Word’s Compare to create a redline document, which I subsequently saved and printed to PDF format. I understand that those documents are being filed in the above-captioned proceeding as Exhibits 2005 and 2007, respectively.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed August 21, 2024 at Vancouver, Washington.



Julia Castellano