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Dear Patent Trial and Appeal Board:

We represent Petitioner Samsung Bioepis Co., Ltd. ("Samsung") in IPR2025-00176 concerning U.S. Patent No. 11,084,865 ("865 patent"). Patent Owner, Regeneron Pharmaceuticals, Inc. ("Regeneron"), filed its Preliminary Response ("POPR") to Samsung's petition in IPR2025-00176 on March 17, 2025.

Samsung seeks leave to submit a 10-page reply to Regeneron's POPR for purposes of responding to (1) Regeneron's argument that the status and issues in prior district court and Federal Circuit proceedings weigh against institution under *Fintiv* and (2) Regeneron's characterization of Samsung's invalidity positions in view of those proceedings. Regeneron does not oppose Samsung's request to file a reply provided that Regeneron is authorized to file a surreply of equal length. For clarity, Regeneron disputes Samsung's characterizations below and will respond as appropriate in its surreply in the event leave is granted.

Samsung contends there is good cause because, *inter alia*, Regeneron offers argument regarding the posture and scope of related proceedings including developments since the filing of Samsung's petition to which Samsung has not had the opportunity to respond. Samsung seeks leave to provide additional context and facts regarding the prior proceedings and to explain why Samsung's petition presents new issues not previously addressed. In addition, Regeneron includes previously confidential exhibits that Samsung could not address in its petition. Samsung seeks the opportunity to respond to these characterizations and Regeneron's new evidence.

If the Board grants this request, Samsung proposes submitting the reply 10 days after the Board's order. Samsung has agreed to Regeneron's filing of a sur-reply of equal length due 21 days after the filing of Samsung's reply, as requested by Regeneron. Samsung maintains that it could not have anticipated Regeneron's representations regarding the prior proceedings, including developments since Samsung filed its petition, or Regeneron's characterizations of Samsung's art. Nor could Samsung have anticipated Regeneron's reliance on previously confidential exhibits in support of its POPR.

If a conference call would be helpful to the Board, we are happy to propose times when both parties are available.

Respectfully,

Ray Nimrod

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