

From: [Director Discretionary Decision](#)
To: [Toft, Lukas](#); [Jim Glass](#); [Director Discretionary Decision](#)
Cc: [Chen, Joe](#); [Suh, Howard S.](#); [Angus Chen](#); [Quincy Lu](#); [Elizabeth Murphy](#)
Subject: RE: CSPC v. Ipsen Biopharm IPR2025-00505
Date: Wednesday, July 2, 2025 3:51:59 PM

Patent Owner's request is denied. If, upon review of Petitioner's opposition, it is determined that the paper contains improper material, it will be treated accordingly.

From: Toft, Lukas <ltoft@foxrothschild.com>
Sent: Tuesday, July 1, 2025 3:32 PM
To: Jim Glass <jimglass@quinnemanuel.com>; Director_Discretionary_Decision <Director_Discretionary_Decision@uspto.gov>
Cc: Chen, Joe <joechen@foxrothschild.com>; Suh, Howard S. <HSuh@foxrothschild.com>; Angus Chen <anguschen@quinnemanuel.com>; Quincy Lu <quincylu@quinnemanuel.com>; Elizabeth Murphy <elizabethmurphy@quinnemanuel.com>
Subject: RE: CSPC v. Ipsen Biopharm IPR2025-00505

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Dear Director and the Board,

Petitioner objects to Patent Owner's email below as contrary to the Board's Order, at least because—and contrary to the assertion below—the parties have not “conferred telephonically or in person” on this issue and the below email contains substantive argument. (See Paper 5 at 6-7.) To the extent the Board wishes to have a call on this issue, Petitioner suggests the parties first confer and, if unable to reach agreement, provide the Board with “multiple times when all parties are available.” (*Id.*) In fact, Patent Owner submits the below request despite Petitioner informing Patent Owner yesterday that its request was procedurally premature (and can provide the parties' email exchange if requested to do so).

Best,
Luke

Lukas Toft
Fox Rothschild LLP
612.607.7336

IPR2025-00505
Ex. 3101

From: Jim Glass <jimglass@quinnemanuel.com>

Sent: Tuesday, July 1, 2025 11:48 AM

To: Director_Discretionary_Decision@USPTO.gov

Cc: Toft, Lukas <ltoft@foxrothschild.com>; Chen, Joe <joechen@foxrothschild.com>; Suh, Howard S. <HSuh@foxrothschild.com>; Angus Chen <anguschen@quinnemanuel.com>; Quincy Lu <quincylu@quinnemanuel.com>; Elizabeth Murphy <elizabethmurphy@quinnemanuel.com>

Subject: [EXT] CSPC v. Ipsen Biopharm IPR2025-00505

Director Stewart,

I am lead counsel for Patent Owner Ipsen Biopharm Ltd. in the above IPR proceeding. Patent Owner respectfully requests permission to file a brief to strike portions of Petitioner's response to Ipsen's discretionary denial brief. Specifically, Patent Owner seeks to strike new evidence improperly submitted with Petitioner's brief, including: (1) a purportedly certified translation of the Conroy Protocol (Ex. 1204), which responds to arguments raised in Patent Owner's POPR; and (2) a new expert declaration (Ex. 1200), which alters opinions offered by Petitioner's expert in support of its petition. Ex. 1200 at ¶ 9.

Both the new declaration and translation are improper under the Director's procedure as new evidence not submitted in the petition and amount to improper attempts to cure substantive deficiencies through the discretionary denial briefing process. *See e.g.*, FAQ 25, 26 for Interim Process for PTAB Workload Management. Patent Owner thus requests the opportunity to submit a short, 5-page motion to strike within three business days of receiving the Director's authority to do so.

The parties have met and conferred, and Petitioner opposes this request.

Respectfully,
Jim Glass

James M. Glass |Chair, Post-Grant Patent Practice| **Quinn Emanuel Urquhart & Sullivan, LLP** | 295 5th Avenue, 9th Floor, New York, NY 10016| Office: +1.212.849.7142| [Web Bio](#)

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