

Brent Batzer

From: Yixin Tang
Sent: Monday, May 12, 2025 12:53 PM
To: Shashank Upadhye; wisej@gtlaw.com
Cc: Elana.Araj@gtlaw.com; pettusr@gtlaw.com; scacciag@gtlaw.com; Brent Batzer
Subject: RE: IPR Petitions - 661 and 291 Patents

Amneal IPR counsel,

Do you intend to file a *Sotera* stipulation in the pending litigation?

Regards,

Yixin

From: Shashank Upadhye <shashank@ipfdalaw.com>
Sent: Tuesday, May 6, 2025 2:51 PM
To: wisej@gtlaw.com; Yixin Tang <yixin@ipfdalaw.com>
Cc: Elana.Araj@gtlaw.com; pettusr@gtlaw.com; scacciag@gtlaw.com; Brent Batzer <brent@ipfdalaw.com>
Subject: RE: IPR Petitions - 661 and 291 Patents

Hello all. Thanks for the message below. Nivagen does not agree to stay the litigation pending the resolution of the IPR's. We can, however, informally agree not to actively push the litigation for the very short term. But this should not be construed in any way that we are agreeing to do nothing in the case nor is there any timeline as to how long we will informally agree to not actively push it.

Regards,
Shashank

From: wisej@gtlaw.com <wisej@gtlaw.com>
Sent: Monday, May 5, 2025 1:43 PM
To: Yixin Tang <yixin@ipfdalaw.com>; Shashank Upadhye <shashank@ipfdalaw.com>
Cc: Elana.Araj@gtlaw.com; pettusr@gtlaw.com; scacciag@gtlaw.com; Brent Batzer <brent@ipfdalaw.com>
Subject: RE: IPR Petitions - 661 and 291 Patents

Yixin,
Amneal does not oppose the pro hac motion. Following up on my 4.21 email, please let us know if Nivagen opposes or agrees to a stay of the litigation pending the outcome of the IPRs.

Thanks,
Jon

Jonathan Wise
Shareholder

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From: Yixin Tang <yixin@ipfdalaw.com>

Sent: Monday, May 5, 2025 10:58 AM

To: Wise, Jonathan (Shld-PHIL-IP-Tech) <wisej@gtlaw.com>; Shashank Upadhye <shashank@ipfdalaw.com>

Cc: Araj, Elana (Shld-NY-IP-Tech) <Elana.Araj@gtlaw.com>; Pettus, Richard C. (Shld-NY-IP-Tech) <pettusr@gtlaw.com>;

Scaccia, Giancarlo (OfCnl-NY-IP-Tech) <scacciag@gtlaw.com>; Brent Batzer <brent@ipfdalaw.com>

Subject: RE: IPR Petitions - 661 and 291 Patents

EXTERNAL TO GT

Jon and the Amneal IPR counsel,

Our firm will be filing a Power of Attorney on behalf of Patent Owner in the two IPRs on the 291 and 661 patents. Since I am not registered or licensed at the PTO, we intend to file a motion for pro hac vice admission for me, on the basis of me being an experienced patent litigator with familiarity with the subject matter of the challenged patents. Can you let us know if you/Amneal would object to the PHV motion? If not, we plan to style the motion as "unopposed." Thanks.

Regards,

Yixin

From: wisej@gtlaw.com <wisej@gtlaw.com>

Sent: Friday, April 11, 2025 9:05 PM

To: Yixin Tang <yixin@ipfdalaw.com>; Shashank Upadhye <shashank@ipfdalaw.com>

Cc: Elana.Araj@gtlaw.com; pettusr@gtlaw.com; scacciag@gtlaw.com

Subject: IPR Petitions - 661 and 291 Patents

Yixin and Shashank,

Please find attached the IPR petitions filed today.

Regards,

Jon

Jonathan Wise

Shareholder

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