

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ITM ISOTOPE TECHNOLOGIES MUNICH SE,

Petitioner

v.

THE JOHNS HOPKINS UNIVERSITY,

Patent Owner

Case PGR2025-00012

U.S. Patent No. 11,938,201

PETITIONER'S SECOND UPDATED EXHIBIT LIST

Pursuant to 37 C.F.R. § 42.63(e), Petitioner ITM Isotope Technologies Munich SE hereby submits a current listing of Petitioner Exhibits. Exhibits 1037 and 1038 are being filed today.

Exhibit No.	Description
1001	U.S. Patent No. 11,938,201 to Yang et al., issued March 26, 2024, with Sept. 24, 2024, Certificate of Correction (“’201 patent”)
1002	Declaration of Dr. Stephen F. Martin
1003	Curriculum Vitae of Dr. Stephen F. Martin
1004	Prosecution History for U.S. Patent No. 11,938,201 (downloaded from USPTO Patent Center)
1005	U.S. Patent Publication No. 2011/0064657 to Pomper et al., published March 17, 2011 (“US ’657”)
1006	U.S. Patent Publication No. 2012/0009121 to Pomper et al., published Jan. 12, 2012 (“Pomper”)
1007	U.S. Patent No. 9,346,814 to Jansen et al., issued May 24, 2016 (“Jansen I”)

Exhibit No.	Description
1008	Petra Dvořáková et al., <i>Inhibitor-Decorated Polymer Conjugates Targeting Fibroblast Activation Protein</i> , 60 JOURNAL OF MEDICINAL CHEMISTRY 8385-8394 (2017), available at https://pubs.acs.org/doi/10.1021/acs.jmedchem.7b00767 (last accessed Dec. 19, 2024) (“Dvořáková”)
1009	U.S. Patent Publication No. 2010/0098633 to Zimmerman et al., published April 22, 2010 (“Zimmerman”)
1010	Keon Jansen et al., <i>Selective Inhibitors of Fibroblast Activation Protein (FAP) with a (4-Quinolinoyl)-glycyl-2-cyanopyrrolidine Scaffold</i> , 2013(4) ACS MEDICINAL CHEMISTRY, 491-96 (2013) (“Jansen II”)
1011	<i>Product Information: ATTO 488.</i> , ATTO-TEC GMBH (2024) available at https://www.atto-tec.com/fileadmin/user_upload/Katalog_Flyer_Support/ATTO_488.pdf (last accessed Dec. 18, 2024)
1012	<i>IVISense™ 680 NHS Fluorescent Labeling Kit: NEV11118</i> , REVVITY, INC., available at https://www.revvity.com/asset-search/tds?part_number=NEV11118 (last accessed Dec. 18, 2024)
1013	<i>Alexa Fluor™ 790 NHS Ester (Succinimidyl Ester)</i> , THERMOFISHER SCIENTIFIC, available at https://www.fishersci.com/shop/products/alexa-fluor-790-nhs-ester-succinimidyl-ester/A37569# (last accessed Dec. 18, 2024).
1014	IRDYE 700 DX, U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES, available at https://drugs.ncats.io/drug/C51A2YUX4N (last accessed Dec. 18, 2024)

Exhibit No.	Description
1015	Ronnie C. Mease et al., <i>N-[N-[(S)-1,3-dicarboxypropyl]carbamoyl]-4-[18F]fluorobenzyl-L-cysteine, [18F]DCFBC: A new Imaging probe for prostate cancer</i> , 14 CLIN CANCER RES 3036-43 (2008)
1016	Suzanne E. Lapi et al., <i>Assessment of an 18F-Labeled Phosphoramidate Peptidomimetic as a New Prostate-Specific Membrane Antigen-Targeted Imaging Agent for Prostate</i> , 50 J NUCL MED 2042-48 (2009)
1017	Ronny Rüger et al., <i>In Vivo Near-Infrared Fluorescence Imaging Of FAP-Expressing Tumors With Activatable FAP-Targeted, Single-Chain Fv-Immunoliposomes</i> , 186 JOURNAL OF CONTROLLED RELEASE 1-10 (2014)
1018	Zhi-Yi Chen et al., <i>Advance of Molecular Imaging Technology and Targeted Imaging Agent in Imaging and Therapy</i> , BIOMED RESEARCH INT'L 819324 (2014)
1019	A. Feinstein et al., <i>Conformation of the Free and Antigen-bound IgM Antibody Molecules</i> , 224 NATURE 1307-09 (1969)
1020	Mark Jordi, <i>Typical Molecular Weights of Common Polymers</i> , RQM+ (April 18, 2018), available at https://www.rqmplus.com/blog/typical-polymer-molecular-weights (last accessed Dec. 24, 2024)
1021	Anne Hellebust et al., <i>Advances in molecular imaging: Targeted Optical Contrast Agents For Cancer Diagnostics</i> , 7 NANOMEDICINE 429-45 (2012)
1022	Sumith A. Kularatne et al., <i>Prostate-Specific Membrane Antigen Targeted Imaging and Therapy of Prostate Cancer Using a PSMA Inhibitor as a Homing Ligand</i> , 6 MOLECULAR PHARMACEUTICS 780-89 (2009)

Exhibit No.	Description
1023	Yonghwang Ha, <i>Recent Conjugation Strategies of Small Organic Fluorophores and Ligands for Cancer-Specific Bioimaging</i> , 248 CHEMICO-BIOLOGICAL INTERACTIONS 36-51 (2016)
1024	Sari Pihlasalo et al., <i>Method for Determination of Polyethylene Glycol Molecular Weight</i> , 87 ANALYTICAL CHEMISTRY 3918-22 (2015)
1025	Declaration of Dr. Stephen F. Martin In Support of Petitioner Discretionary Denial Brief
1026	Stephen Martin, Seminar Presentation at Cedars-Sinai, Los Angeles, CA: <i>Applications of Chemistry to Unmet Medical Needs in Neuroscience</i> (May 11, 2017)
1027	Stephen Martin, NIH Small Business Technology Transfer Proposal (2017).
1028	Paul J. Trim et al., <i>Small Molecule MALDI MS Imaging: Current Technologies and Future Challenges</i> , 104 Methods 127, 129 (2016)
1029	Isotta Chimenti et al., <i>Biochemistry and Biology: Heart-to-heart to Investigate Cardiac Progenitor Cells</i> , 1830 Biochimica et Biophysica Acta 2459, 2465 (2013)
1030	Erica J. Carbone et al., <i>Small Molecule Delivery Through Nonfibrous Scaffolds for Musculoskeletal Regenerative Engineering</i> , 19 Nanomedicine 1691 (Nov. 2014)

Exhibit No.	Description
1031	Executive Order 14273, Lowering Drug Prices by Once Again Putting Americans First (Apr. 15, 2025), available at https://www.whitehouse.gov/presidential-actions/2025/04/lowering-drug-prices-by-once-again-putting-americans-first/
1032	Klobuchar, Grassley Introduce Bipartisan Bills to Reduce Drug Prices by Promoting Competition and Taking on Big Pharma, United States Senator Amy Klobuchar (Mar. 26, 2025), available at https://www.klobuchar.senate.gov/public/index.cfm/2025/3/klobuchar-grassley-introduce-bipartisan-bills-to-reduce-drug-prices-by-promoting-competition-and-taking-on-big-pharma
1033	Press Release, ITM, ITM Appoints Roger Estafanos as U.S. General Manager and Expands Presence with Opening of U.S. Headquarters in Princeton, New Jersey (Apr. 17, 2023), available at https://www.itm-radiopharma.com/news/press-releases/press-releases-detail/ITM_Appoints_Roger_Estafanos_as_U.S._General_Manager_and_Expands_Presence_with_Opening_of_U.S._Headquarters_in_Princeton,_New_Jersey-609/
1034	“Ga68-ITM-74D,” Synapse, https://synapse.patsnap.com/drug/4e4c9bfab0a3463192ecd5712dcc963f#research (last updated May 25, 2025)

Exhibit No.	Description
1035	<i>Company Detail: Bracco S.P.A., Italian Business Register, available at https://italianbusinessregister.it/en/company-detail?p_p_id=risultatiricercaimprese_WAR_ricercaPIportlet&p_p_lifecycle=0&p_p_state=normal&_risultatiricercaimprese_WAR_ricercaPIportlet_view=%2Frisultatiricercagrattuita%2Fdettaglio_impresa.jsp&_risultatiricercaimprese_WAR_ricercaPIportlet_pageToken=eyJhbGciOiJIUzI1NiIsInR5cCI6IkpXVCJ9.eyJjb3VudCI6MjUwLCJleHAiOiJlE3NDg0Njg3OEV9.KQL5_TFOcQSBpBu9aYNQYQyXpQhYwqeo1YIPm7kKGLU (last accessed May 27, 2025)</i>
1036	Declaration of Stephen F. Martin, Ph.D. (served but not filed on August 13, 2025)
1037	CONFIDENTIAL License and Settlement Agreement (Filed Under Seal)
1038	CONFIDENTIAL Upstream Consent (Filed Under Seal)

Respectfully submitted,

Dated: October 3, 2025

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CERTIFICATE OF SERVICE

The undersigned certifies that on October 3, 2025, a copy of the foregoing
**PETITIONER'S SECOND UPDATED EXHIBIT LIST AND EXHIBITS 1037
TO 1038** have been served on Patent Owner's counsel of record via electronic mail
as follows:

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