

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Merck Sharp & Dohme LLC,
Petitioner,

v.

Halozyme Inc.,
Patent Owner.

Case Nos. PGR2025-00030
U.S. Patent Nos. 12,054,758

**PETITIONER'S OPPOSITION TO PATENT OWNER'S MOTION FOR
ADDITIONAL DISCOVERY**

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I. Introduction

Halozyme's motion does not demonstrate that additional discovery is warranted and confirms that its meritless RPI fishing expedition should end here. Even though Halozyme waited far too long to raise an RPI issue, Petitioner Merck Sharp & Dohme LLC ("Petitioner") tried to avoid burdening the Board with motion practice. Petitioner *voluntarily* and in good faith provided to Halozyme *all* of the information and documents requested during the meet and confer process. That included responses to every interrogatory, and a document production with: (1) payment records (showing Petitioner alone has funded these proceedings), (2) agreements (showing Petitioner alone retained all outside counsel and experts), and (3) internal employment and payroll records (showing all individuals involved in these proceedings are employees of Petitioner alone). Petitioner's responses definitively confirm that Petitioner's parent holding company, Merck & Co., Inc. ("MCI"), is *not* an RPI to these proceedings. Halozyme does not argue otherwise.

In compliance with 37 C.F.R. § 42.51(b), Petitioner redacted some confidential information not "directly related to factual assertions" concerning RPI. Halozyme now seeks unredacted copies of those documents. But Halozyme does not try to justify its request based on anything *in those documents themselves*. Instead, it points to general public "information available so far" unconnected to this case. Mot. 2, 8-9. Halozyme speculates that it *might* find a (nonexistent) RPI

golden ticket lurking under the redactions. Such speculation does not establish good cause for the intrusions Halozyme seeks.

Even if the Board were to find MCI is an RPI, Federal Circuit and PTAB precedent (confirmed in *Aylo Freesites Ltd. v. Dish Techs. L.L.C.*, IPR2024-00940, Paper 71 (Jan. 9, 2026) (“*Aylo*”)) holds Petitioner should be permitted to correct this issue without losing its filing date. Halozyme is looking for an undeserved windfall, and the Board should reject it. Further discovery is unnecessary.

II. Factual Background

On November 11, 2025, Halozyme contacted Petitioner, asserting Petitioner “is a wholly owned subsidiary of its parent company, [MCI]” and that “[b]ased on [its] review of public information to date,” it had concluded “Ppetitioner should have listed [MCI] as an RPI” to each PGR proceeding. EX2401, 17-18. Halozyme served interrogatories and document requests. For requested employment agreements, it instructed Petitioner to “redact information relating to compensation or other information unrelated to a job title, description, or obligation.” *Id.*

Ppetitioner promptly informed Halozyme of the problems with the request. Halozyme had not identified the “public information” allegedly supporting its position, and had waived the issue, including by raising it after filing its PORs. *Id.*, 14-15. On January 6, 2026, one hour before filing its motion, Halozyme revealed the “publicly available documents” for the first time. EX2401, 1-2. Nevertheless,

Petitioner had already confirmed that it alone employs all in-house counsel that have participated in these proceedings, exclusively funded these proceedings, and that MCI has had no involvement with these proceedings. *Id.*

Rather than respond substantively to Petitioner's representations, Halozyme brought the issue to the Board. *Id.*, 14. When the Board did not schedule a call, Halozyme unilaterally contacted the Board to propose briefing, which the Board authorized. Four days later, to try to avoid motions practice, Petitioner provided robust responses to all of Halozyme's requests. *Id.*, 7-10. Halozyme nonetheless took issue with redactions in certain documents. *Id.*, 6-7. In response, Petitioner explained the basis for its redactions, and confirmed that "none of the redacted materials refer to any particular Merck entity other than Petitioner," with a single compensation-related exception that was redacted consistent with Halozyme's own instruction. *Id.*, 5. Halozyme still filed its motion.

III. Halozyme Has Not Shown That Production of Unredacted Documents Will Reveal Useful Information Under *Bloomberg* Factor One

Additional discovery in a PGR is granted only for "good cause." 37 C.F.R. § 42.51(b)(2)(i); 37 C.F.R. § 42.224(a); *see also Bloomberg Inc. v. Market Alert Pty Ltd.*, CBM2013-00005, Paper 32, at 2-3 (PTAB May 29, 2013). Additional discovery "is limited to evidence directly related to factual assertions advanced by either party in the proceeding." 37 C.F.R. § 42.224(b). *Bloomberg* requires "a specific factual reason for expecting reasonably that the discovery will be

‘useful.’” Paper 32 at 5.¹ “‘Useful’ means favorable in substantive value to a contention of the party moving for discovery.” *Id.* “The mere possibility of finding something useful, and mere allegation that something useful will be found, are insufficient.” *Id.* Halozyme fails to show good cause for several reasons.

First, Halozyme has no basis to claim that redacted text will “likely” reveal “blurred corporate lines,” or “the ability of [MCI] to control and fund this PGR proceeding.” Mot., 2-3. Discovery already provided by Petitioner disproves Halozyme’s speculations: (1) no individual from MCI has been involved in these PGRs, (2) Petitioner alone receives, reviews, and pays all invoices associated with these PGRs, and (3) Petitioner’s in-house counsel in these PGRs, including Mr. Stewart, are employed by, paid by, and hold titles with Petitioner only. EX2401, 8-10. Unredacted portions of Petitioner’s document production (including engagement agreements, HR records, payroll statements, and payments to outside counsel) confirm these facts. EX2426-EX2444. They also confirm Petitioner alone has engaged all experts and outside counsel. EX2402-EX2406.

Second, and relatedly, Petitioner’s discovery undermines Halozyme’s speculation. The bullets on page nine of Halozyme’s brief are not about this case.

¹ Halozyme incorrectly cites *Garmin*, which applies to IPRs. *SWM Int’l, LLC v. Dynaenergetics Eur. GMBH*, PGR2021-00097, Paper 79, 3 (PTAB Nov. 10, 2022).

Halozyme does not explain how an “OED document” (Mot., 9) could usurp Mr. Stewart’s actual employment agreement, HR records, and payroll information—which all confirm Mr. Stewart’s affiliation with Petitioner, not MCI. EX2404; EX2430; EX2434. Nor does Halozyme explain why a stock-compensation provision in Mr. Stewart’s employment agreement—a provision Halozyme itself said could be redacted (EX2401, 3, 5, 18)—is relevant to RPI. Mot., 5; *see also Gillig v. Nike, Inc.*, 602 F.3d 1354, 1362 (Fed. Cir. 2010) (“[C]ontrol of a party to the litigation through stock ownership or corporate officership is not enough to create *privity*, absent a showing that the corporate form has been ignored.”).

Halozyme speculates about the redactions to Petitioner’s agreements with outside counsel. Halozyme posits, for example, that sections on “Conflicts of Interest” and “Reporting” are “likely to identify or refer to MSD affiliates or corporate partners.” Mot., 5. But Halozyme does not explain how or why provisions relating to counsel’s assessment of potential new clients bear on the RPI issue. Nor is there any need to reveal such commercially-sensitive information to competitor firms when unredacted portions (1) confirm Petitioner alone retained all outside counsel, and (2) show the extent to which those engagements extend to affiliates. EX2402, 1-3; EX2403, 1-4. The Board has rejected this kind of request. *New World Med., Inc. v. MicroSurgical Tech., Inc.*, IPR2020-01573, Paper 13, 6-7 (PTAB Dec. 10, 2020) (denying request to remove redactions where unredacted

portions of documents resolved RPI allegations); *Unified Patents Inc. v. American GNC Corp.*, IPR2019-00505, Paper 20, at 8 (PTAB Apr. 12, 2019) (similar).

Third, Petitioner’s redactions were consistent with 37 C.F.R. § 42.51(b)(2). The redacted information has no bearing on the RPI issue but contains sensitive information about issues unrelated to the RPI inquiry, like employment terms, outside counsel engagement terms, compensation, accounting records, and personal information. EX2401, 3, 5-6. Halozyme, in fact, concedes that redactions to *certain types* of irrelevant information (monetary amounts, home addresses, and social security numbers, Mot., 5-6; EX2401, 4, 18) are appropriate. And Halozyme provides no authority for its arbitrary demand that *other* information be unredacted despite Petitioner’s representations about their irrelevance.²

In the main, Halozyme’s position rests on MCI’s “mere status as a corporate parent,” which “is insufficient to render an entity an RPI (or even a privy).” *See Syngenta Crop Prot. AG v. FMC Corp.*, PGR2020-00028, Paper 8 at 15 (PTAB Sept. 15, 2020); *Corning Optical Commc’ns RF, LLC v. PPC Broadband, Inc.*, IPR2014-00440, Paper 68 at 22 (PTAB Aug. 18, 2015) (precedential) (“*Corning*”); *TRW Auto. US LLC v. Magna Elecs. Inc.*, IPR2014-01497, Paper 7 at 10 (PTAB

² To confirm Petitioner’s representations, upon the Board’s request, Petitioner is willing to provide the documents and a redaction log for *in camera* review.

Mar. 19, 2015) (“generic references to the existence of a parent/subsidiary business relationship in SEC documents” do not establish RPI); *contra. Corning*, at 4-5, 7-11, 19-23 (RPI parent company engaged and paid outside counsel, and employed in-house counsel that directed IPR proceedings). That MCI was named as an RPI in some past proceedings does not mean MCI must always be an RPI with Petitioner, or establish that, in those prior cases, MCI was not simply named an RPI out of an abundance of caution, even though it was not. The RPI analysis applies on a petition-specific basis, and there is no penalty for naming an additional entity. Regardless, evidence shows MCI is definitively not an RPI here.

Finally, Halozyme’s position here is irreconcilable with the RPI position its counsel, Quinn Emanuel, took when representing Petitioner in prior PGR proceedings related to Petitioner’s Keytruda[®] product. In those proceedings, Quinn Emanuel correctly named Petitioner Merck Sharp & Dohme as the *only* RPI. EX1165. In this PGR, which also relates to Keytruda[®], Quinn Emanuel takes the opposite position. Mot., 3; EX1164; EX2058. Quinn Emanuel’s prior representation that MCI was not an RPI in PGRs involving the same entities undermines Halozyme’s current position. This history suggests Halozyme’s RPI challenge is litigation-driven gamesmanship and not good-faith concern.

IV. Halozyme Waived the RPI Issue By Delaying Too Long.

Halozyme ignored the Board’s request to explain “when and how [it] first

became aware of MCI's role as an alleged RPI" because the answer is damning: Halozyme has known about MCI since *at least* July 2025 and likely years prior. In April 2025, Halozyme filed suit naming Merck Sharp & Dohme Corp. as the lone defendant. EX2058. Petitioner informed Halozyme, represented by Quinn Emanuel, that the "Corp." entity was reorganized as an "LLC," so Halozyme updated its filings to name the reorganized entity. EX1166; EX1167. In July 2025, Petitioner also served a corporate disclosure identifying MCI as its parent. EX1168. But Halozyme never sued MCI. Quinn Emanuel also knew of Petitioner's corporate structure based on its prior Keytruda[®] work, and Halozyme purports to rely on public documents to allege MCI is an RPI. These facts render Halozyme's delay in raising the RPI issue until mid-November 2025, after nearly all challenged patents were past their nine-month PGR window, inexcusable.

Halozyme's excuse is meritless. Halozyme claims it was spurred to action when the Director designated *Corning* precedential. Mot., 3. But neither *Corning* nor the Director purport to have altered the established factors relevant to the RPI analysis. *Corning*, at 14-15 (compiling RPI law). The facts here do not align with the Director's reasoning in the *Corning* memorandum to ensure naming of foreign RPIs. Petitioner and MCI are American. "[T]he Director's actions did not affect other precedential decisions ... regarding the identification of RPIs" and "patent owners should not be rewarded for delaying RPI challenges." *Aylo*, Paper 71 at 2, 9

n.3; see also *Lumentum Holdings, Inc. v. Capella Photonics, Inc.*, No. IPR2015-00739, 2016 WL 2736005, at *4 (PTAB Mar. 4, 2016) (precedential) (four month delay in raising RPI issue does not warrant “extraordinary relief” of termination).

Halozyme continues to not raise the RPI issue in *all* of its PORs, including those filed days ago. The Board has made clear in every scheduling order that Halozyme’s failure should result in waiver. *E.g.* PGR2025-00003, Paper 26, at 9; *Interactive Comms. Int’l, Inc. v. Blackhawk Network Inc.*, IPR2024-00465, Paper 36, at 5 (PTAB July 14, 2025) (previously-raised RPI issue waived for failure to raise in POR). To uphold the integrity of the PGR process, the Board should not consider Halozyme’s untimely request to upend these common proceedings.

V. Even If MCI Is Found to Be an RPI, Petitioner Should Be Permitted to Amend Its Mandatory Notices Without Adjustment to Its Filing Dates

The Board instructed the parties to address *Adello Biologics LLC v. Amgen Inc.*, PGR2019-00001, Paper 11 (PTAB Feb. 14, 2019) (precedential) (“*Adello*”). In *Adello*, the Board authorized petitioner to amend its RPI listing without losing the petition’s original filing date. *Adello*, at 3. Halozyme attempts to distinguish *Adello* because Petitioner allegedly “doubled down” on its “story” that MCI is not an RPI. Mot., 7-8. But Petitioner need not concede the RPI dispute to moot the RPI issue by amending its mandatory notices. *Proppant Express Investments, LLC v. Oren Techs., LLC*, IPR2017-01917, Paper 86, 6-9, 14-15 (PTAB Feb. 13, 2019) (precedential); *Mayne Pharma Int’l Pty. Ltd. v. Merck Sharp & Dohme Corp.*, 927

F.3d 1232, 1239-40 (Fed. Cir. 2019) (affirming RPI amendment conditioned on maintaining filing date).

Permitting Petitioner to amend its mandatory notices without penalty is consistent with the policies that underly the RPI requirement. “[R]equiring a petition to identify all RPIs serves to assist members of the Board in identifying potential conflicts, and to assure proper application of the statutory estoppel provisions.” *Adello*, 3-4. The factors in *Adello* are also met here (*id.*, 3-5): the Board was “able to check for conflicts” for all MCI-related entities based on identification of Petitioner, and there are no estoppel or time-bar concerns.

There is also no evidence of gamesmanship or bad faith by Petitioner, and Halozyme has suffered no prejudice. An RPI amendment identifying MCI would leave Halozyme in the same position as if MCI had been listed as an RPI in the Petition. *Adello*, at 3-5. The Board recently confirmed that, post-*Corning*, a “Petitioner may update its identification of RPIs so long as it meets the requirements outlined in *Proppant*,” which track *Adello*. *Aylo*, 8-9. The Board has also recognized “the rule governing RPI disclosures is [not] designed to award a patent owner” with a “windfall” of PGR dismissal. *Adello*, 3-4.

If MCI is found to be an RPI, Petitioner is willing to amend its notices to identify MCI provided the petitions’ filing dates are maintained. As such, additional discovery serves no useful purpose and should not be authorized.

Dated: January 19, 2026

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I hereby certify that on this 19th day of January, 2026, I caused to be served a true and correct copy of the foregoing and any accompanying exhibits by e-mail on the following counsel of record for Patent Owner:

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EXHIBIT LIST

No.	Exhibit Description
1001	U.S. Patent No. 12,054,758
1002	File History of U.S. Patent No. 12,054,758
1003	Declaration of Dr. Michael Hecht
1004	Declaration of Dr. Sheldon Park
1005	U.S. Patent No. 7,767,429
1006	Chao et al., "Structure of Human Hyaluronidase-1, a Hyaluronan Hydrolyzing Enzyme Involved in Tumor Growth and Angiogenesis," <i>Biochemistry</i> , 46:6911-6920 (2007)
1007	WO 2010/077297, published 8 July 2010
1008	Stern et al., "The Hyaluronidases: Their Genomics, Structures, and Mechanisms of Action," <i>Chem. Rev.</i> 106:818-839 (2006)
1009	Jedrzejewski et al., "Structures of Vertebrate Hyaluronidases and Their Unique Enzymatic Mechanism of Hydrolysis," <i>Proteins: Structure, Function and Bioinformatics</i> , 61:227-238 (2005)
1010	Zhang et al., "Hyaluronidase Activity of Human Hyal1 Requires Active Site Acidic and Tyrosine Residues," <i>J. Biol. Chem.</i> , 284(14):9433-9442 (2009)
1011	Arming et al., "In vitro mutagenesis of PH-20 hyaluronidase from human sperm," <i>Eur. J. Biochem.</i> , 247:810-814 (1997)
1012	Bordoli et al., "Protein structure homology modeling using SWISS-MODEL workspace," <i>Nature Protocols</i> , 4(1):1-13 (2008)
1013	Frost, "Recombinant human hyaluronidase (rHuPH20): an enabling platform for subcutaneous drug and fluid administration," <i>Expert Opinion on Drug Delivery</i> , 4(4):427-440 (2007)
1014	Brandon & Tooze, "Introduction to Protein Structure," Second Ed., Chapters 1-6, 11-12, 17-18 (1999)
1015	Table Associating Citations from the '758 Patent (EX1001) to Corresponding Citations in the '731 Application (EX1026)

No.	Exhibit Description
1016	Steipe, "Consensus-Based Engineering of Protein Stability: From Intrabodies to Thermostable Enzymes," <i>Methods in Enzymology</i> , 388:176-186 (2004)
1017	Green, "Computer Graphics, Homology Modeling, and Bioinformatics," <i>Protein Eng'g & Design</i> , Ch. 10, 223-237 (2010)
1018	Chica et al., "Semi-rational approaches to engineering enzyme activity: combining the benefits of directed evolution and rational design," <i>Curr. Opin. Biotechnol.</i> , (4):378-384 (2005)
1019	Hardy et al., "Assessment of contraceptive vaccines based on recombinant mouse sperm protein PH20," <i>Reprod.</i> , 127:325-334 (2004)
1020	Pomering et al., "Restricted Entry of IgG into Male and Female Rabbit Reproductive Ducts Following Immunization with Recombinant Rabbit PH-20," <i>Am. J. Reprod. Immunol.</i> , (3):174-82 (2002)
1021	Baba et al., "Mouse Sperm Lacking Cell Surface Hyaluronidase PH-20 Can Pass through the Layer of Cumulus Cells and Fertilize the Egg," <i>J. Biol. Chem.</i> , 277(33):30310-4 (2002)
1022	Primakoff et al., "Reversible Contraceptive Effect of PH-20 Immunization in Male Guinea Pigs," <i>Biol Reprod.</i> , 56(5):1142-6 (1997)
1023	Tung et al., "Mechanism of Infertility in Male Guinea Pigs Immunized with Sperm PH-20," <i>Biol. Reprod.</i> , 56(5):1133-41 (1997)
1024	Rosengren et al., "Recombinant Human PH20: Baseline Analysis of the Reactive Antibody Prevalence in the General Population Using Healthy Subjects," <i>BioDrugs</i> , 32(1):83-89 (2018)
1025	U.S. Patent No. 9,447,401
1026	U.S. Patent Application No. 13/694,731
1027-1028	[Reserved]
1029	Gmachl et al., "The human sperm protein PH-20 has hyaluronidase activity," <i>FEBS Letters</i> , 3:545-548 (1993)
1030	Sills, "Retraction," <i>Science</i> , 319:569 (2008)

No.	Exhibit Description
1031	Yue et al., “Loss of Protein Structure Stability as a Major Causative Factor in Monogenic Disease,” J. Mol. Biol., 353:459-473 (2005)
1032	Wang & Moulton, “SNPs, Protein Structure, and Disease,” Hum. Mutation, 17:263-270 (2001)
1033	Marković-Housley et al., “Crystal Structure of Hyaluronidase, a Major Allergen of Bee Venom,” Structure, 8:1025-1035 (2000)
1034	“Negative Results,” Nature: Editorials, 453:258 (2008)
1035	Lins et al., “Analysis of Accessible Surface of Residues in Proteins,” Protein Sci., 12:1406-1417 (2003)
1036	Hayden, “Chemistry: Designer Debacle,” Nature, 453:275-278 (2008)
1037	Benkert et al., “Toward the Estimation of the Absolute Quality of Individual Protein Structure Models,” Bioinformatics, 27:343-350 (2010)
1038	Schwede et al., “SWISS-MODEL: An Automated Protein Homology-Modeling Server,” Nucleic Acids Res., 31:3381-3385 (2003)
1039	Alberts, “Molecular Biology of the Cell,” Fifth Edition, Chapter 3 (2007).
1040	He et al., “NMR Structures of Two Designed Proteins with High Sequence Identity but Different Fold and Function,” PNAS, 105:14412-14417 (2008)
1041	Alexander et al., “A Minimal Sequence Code for Switching Protein Structure and Function,” PNAS, 106:21149-21154 (2009)
1042	Ruan et al., “Design and Characterization of a Protein Fold Switching Network,” Nature Comm., 14 (2023)
1043	Sievers et al., “Fast, Scalable Generation of High-Quality Protein Multiple Sequence Alignments Using Clustal Omega,” Molecular Sys. Biology, 7.1 (2011)
1044	Mihel, “PSAIA – Protein Structure and Interaction Analyzer,” BMC Structural Biology, 8:21 (2008)
1045	Redline Comparison of the '731 and '758 Specifications

No.	Exhibit Description
1046	Beasley & Hecht, "Protein Design: The Choice of <i>de Novo</i> Sequences," J. Biological Chemistry, 272:2031-2034 (1997)
1047	Xiong et al., "Periodicity of Polar and Nonpolar Amino Acids is the Major Determinant of Secondary Structure in Self-Assembling Oligomeric Peptides," PNAS, 92: 6349-6353 (1995)
1048	Hayden, "Key Protein-Design Papers Challenged," Nature, 461:859 (2009)
1049	KEGG, DRUG: Hyaluronidase (human recombinant), available at: https://www.genome.jp/entry/D06604
1050	Pace & Scholtz, "A Helix Propensity Scale Based on Experimental Studies of Peptides and Proteins," Biophysical J. 75:422-427 (1998)
1051	U.S. Patent Application No. 61/631,313
1052	U.S. Patent Application No. 61/796,208
1053	Hom_pre2011
1054	Hom_pre2011_header
1055	Hom_pre2011_header_clean
1056	Hom_pre2011.fasta
1057	Ph20_pre2011.aln-clustal_num
1058	Ph20_pre2011 Alignment html
1059	Leisola & Turunen, "Protein Engineering: Opportunities and Challenges," Appl. Microbiol. Biotechnol. 75:1225-1232 (2007)
1060	Hecht et al., "De Novo Proteins from Designed Combinatorial Libraries," Protein Sci., 13:1711-1723 (2004)
1061	Rosengren et al., "Clinical Immunogenicity of rHuPH20, a Hyaluronidase Enabling Subcutaneous Drug Administration," AAPS J., 17:1144-1156 (2015)
1062-1063	[Reserved]
1064	Collection of BLAST Webpages from the Internet Archive, navigable from:

No.	Exhibit Description
	https://web.archive.org/web/20111022151531/http://www.clustal.org/omega/
1065	Collection of Clustal Omega Webpages from the Internet Archive, navigable from: https://web.archive.org/web/20111022151531/http://www.clustal.org/omega/
1066	Collection of SWISS-MODEL Webpages from the Internet Archive, navigable from: https://web.archive.org/web/20110519141121/http://swissmodel.expasy.org/?pid=smh01&uid=&token=
1067	Collection of PyMol Webpages from the Internet Archive, navigable from: https://web.archive.org/web/20110701072314/http://pymol.org/
1068	Declaration of Jeffrey P. Kushan
1069	Swiss Model Printout of PH20 Model
1070	Swiss Model Printout of PH20 Model with L317Q Mutation
1071	Swiss Model Printout of PH20 Model with L317R Mutation
1072	Swiss Model Printout of PH20 Model with L317M Mutation
1073	[Reserved]
1074	Swiss Model Printout of PH20 Model with L317I Mutation
1075	[Reserved]
1076	Declaration of Leif E. Peterson, II
1077-1081	[Reserved]
1082	United States District Court – National Judicial Caseload Profile, navigable from: https://www.uscourts.gov/data-news/reports/statistical-reports/federal-court-management-statistics/federal-court-management-statistics-december-2024
1083	Table Showing Outcomes of Disputed Motions to Stay Pending IPRs in DNJ
1084	News Release: “Halozyme Raises 2025 Financial Guidance Ranges and Reports Strong First Quarter 2025 Results,” navigable from: https://www.prnewswire.com/news-releases/halozyme-raises-2025-

No.	Exhibit Description
	financial-guidance-ranges-and-reports-strong-first-quarter-2025-results-302447541.html
1085	News Release: “Merck Breaks Ground on New \$1 Billion Biologics Center of Excellence in Wilmington, Delaware,” navigable from: https://www.merck.com/news/merck-breaks-ground-on-new-1-billion-biologics-center-of-excellence-in-wilmington-delaware/
1086	Halozyne Therapeutics, Inc. Q1 2025 Earnings Call Transcript (May 6, 2025)
1087-1112	[Reserved]
1113	Declaration of Sue Wang
1114	Declaration of Brian M. Goldberg
1115	Declaration of Katherine A. Helm
1116-1163	[Reserved]
1164 [NEW]	MERCK_PGR00355 - PTAB-PGR2021-00036-1 Merck-Genentech PGR
1165 [NEW]	MERCK_PGR00458 - PTAB-PGR2021-00036-16 Merck-Genentech PGR
1166 [NEW]	MERCK_PGR00462 - RE_2_25-cv-03179-ES-JRA_HALOZYME, INC. v. MERCK SHARP & DOHME CORP.
1167 [NEW]	MERCK_PGR00094 - DNJ-2-25-cv-03179 Stipulation to Substitute Parties
1168 [NEW]	MERCK_PGR00090 - DNJ-2-25-cv-03179 2025-07-14 [019] Corporate Disclosure Statement