

From: [Alex Menchaca](#)
To: [Megan Raymond](#); [Ben J. Mahon](#); [J. Steven Baughman](#)
Cc: [391PGR](#); [151IPR](#)
Subject: RE: IPR2025-00799 and PGR2025-00043
Date: Saturday, December 6, 2025 1:13:09 PM
Attachments: [image001.png](#)
[McAndrews-Logo_321ead36-a59e-4ed1-9b90-b1b3e93b0006.PNG](#)

Dear Megan,

Regarding Jina, Intas does not agree that Jina is and was an RPI at the time of filing. But Intas and Jina agree to add Jina at this time as an RPI for purposes of the current proceedings and for the parties and the PTAB to avoid unnecessary motion practice. *See Proppant Express Investments, LLC v. Oren Techs., LLC*, Case IPR2017-01917, Paper 86, at *7 (February 13, 2019) (Precedential) (“we see nothing wrong with” identifying a party as an RPI “without admitting they are in fact real-parties-interest” as the “identification fulfills the key purposes of identifying the real parties in interest.”)

Best regards,

Alex



Alejandro Menchaca

Attorney at Law

McAndrews, Held & Malloy, Ltd.

500 W. Madison St., 34th Floor | Chicago, IL 60661

P: 312-775-8103

AMENCHACA@mcandrews-ip.com

[bio](#) | [v-card](#) | [website](#)

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From: Megan Raymond <megan.raymond@groombridgewu.com>

Sent: Friday, December 5, 2025 3:55 PM

To: Ben J. Mahon <BMahon@mcandrews-ip.com>; J. Steven Baughman <steve.baughman@groombridgewu.com>

Cc: 391PGR <391PGR@mcandrews-ip.com>; 151IPR <151IPR@mcandrews-ip.com>

Subject: RE: IPR2025-00799 and PGR2025-00043

CAUTION: External Email

Ben,

Apologies for the delay. I had a Federal Circuit argument this morning and am just starting to catch up on emails. While we consider your requests related to the RPI and expert issues, and in view of Monday's deadline for the motions for discovery, does Intas agree that Jina is and was an RPI at the time of filing?

Thanks for the update regarding Dr. Miller. I hope he is progressing with recovery.

Are you available early next week if a call between the parties makes sense?

Sincerely,
Megan

From: Ben J. Mahon <BMahon@mcandrews-ip.com>
Sent: Thursday, December 4, 2025 8:51 AM
To: Megan Raymond <megan.raymond@groombridgewu.com>; J. Steven Baughman <steve.baughman@groombridgewu.com>
Cc: 391PGR <391PGR@mcandrews-ip.com>; 151IPR <151IPR@mcandrews-ip.com>
Subject: RE: IPR2025-00799 and PGR2025-00043

Megan,

Intas intends to email the Board and request leave to file a motion to add Jina as an RPI consistent with the *Adello* case cited by the Board. While Intas maintains that it is the proper RPI and the entity funding and controlling the PGR/IPR and Jina was correctly identified as a party with an interest, Jina has agreed to being named an additional RPI. Please let us know if Atossa's position.

Additionally, as we previously mentioned, Dr. Miller is no longer available to participate in this proceeding. We have learned that Dr. Miller has suffered a stroke and cannot sit for a deposition or otherwise participate in the proceedings. We intend to ask the Board for permission to file a motion to substitute Dr. Bill Mayo for Dr. Miller. Dr. Mayo trained Dr. Miller and sold H&M analytics to Dr. Miller. Dr. Mayo would adopt Dr. Miller's opinions other than providing his own background and changing first person to third person where necessary. Please let us know Atossa's position on this issue as well.

If it would be helpful, we are happy to hop on a call and discuss. Please also let us know your availability for a conference call.

Best,

Ben

A proposed email to the Board is below.

Dear Honorable Board,

Petitioner Intas Pharmaceuticals Ltd. respectfully requests a conference call to request leave to file two motions.

First, Petitioner requests leave to file a motion to amend the mandatory disclosures to add Jina Pharmaceuticals as an RPI. Patent Owner Atossa Therapeutics, Inc. [opposes/does] not oppose this request.

Second, Petitioner's XRPD expert Dr. Miller has suffered a stroke and can no longer participate in this proceeding. Petitioner requests leave to file a motion to substitute Dr. Bill Mayo as an expert who will adopt Dr. Miller's opinions. Patent Owner Atossa Therapeutics, Inc. [opposes/does] not oppose this request.

The parties are available _____ for a conference call with the Board if necessary.



Ben Mahon

Attorney at Law

McAndrews, Held & Malloy, Ltd.

500 W. Madison St., 34th Floor | Chicago, IL 60661

P: 312-775-8000

BMahon@mcandrews-ip.com

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From: Ben J. Mahon <BMahon@mcandrews-ip.com>

Sent: Monday, December 1, 2025 3:56 PM

To: Megan Raymond <megan.raymond@groombridgewu.com>; J. Steven Baughman <steve.baughman@groombridgewu.com>

Cc: 391PGR <391PGR@mcandrews-ip.com>; 151IPR <151IPR@mcandrews-ip.com>

Subject: IPR2025-00799 and PGR2025-00043 - Supplemental Evidence

Counsel,

Attached please find Petitioner's Supplemental Evidence in the above proceedings.

Best,

Ben



Ben Mahon

Attorney at Law

McAndrews, Held & Malloy, Ltd.

500 W. Madison St., 34th Floor | Chicago, IL 60661

P: 312-775-8000

BMahon@mcandrews-ip.com

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