



ARTICLES

Biotech Buzz

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Lynn Tyler wrote an article in the January issue of AIPLA Biotechnology Committee's "Biotech Buzz" quarterly e-newsletter. The article discussed *Valeant Pharm. N.A. LLC v. Mylan Pharm., Inc.*, in which the Federal Circuit held that, for venue purposes in Hatch-Waxman cases, an act of infringement occurs only in districts where actions related to the submission of an Abbreviated New Drug Application (ANDA) occur.

RELATED PEOPLE



Lynn C. Tyler, M.S.

Partner
Indianapolis

P 317-231-7392
F 317-231-7433
lynn.tyler@btlaw.com