

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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AKER BIOMARINE AS  
Petitioner

v.

NEPTUNE TECHNOLOGIES AND BIORESSOURCES INC.  
Patent Owner

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CASE IPR2014-00003  
U.S. Patent No. 8,278,351

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MOTION FOR ENTRY OF PROTECTIVE ORDER

Pursuant to the May 5, 2014 Order – Conduct of the Proceedings – 37 C.F.R. § 42.5 (Paper 38, *see, e.g.*, pages 4-5), Patent Owner NEPTUNE TECHNOLOGIES AND BIORESSOURCES INC. (“Neptune”), moves for entry of an amended version of the Default Protective Order (*Office Trial Practice Guide*, 77 Fed. Reg. 48756, 48771 (Aug. 14, 2012)), in this case. This amended version of the Default Protective Order has been agreed upon by Neptune and Petitioner AKER BIOMARINE AS (“Aker”) and would be used in the event the parties exchange and/or file confidential information during the course of the present proceedings.

Neptune and Aker anticipate that sensitive confidential information will be disclosed in these proceedings and request entry of a Protective Order that has been amended in a manner that is agreeable to the parties and yet is not significantly divergent from the Default Protective Order.

The proposed amendments to the Default Protective Order are shown in redline in the attached Appendix. A clean copy of the amended version of the Default Protective Order for which entry is sought is also being filed as EXHIBIT 2033.

Aker does not oppose this motion.

Dated: June 3, 2014

Respectfully submitted,  
COOLEY LLP

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**CERTIFICATION OF SERVICE UNDER 37 C.F.R. §§ 42.6(e), 42.205(b)**

I, Stephen L. Altieri, Ph.D., hereby certify that a complete copy of:

- MOTION FOR ENTRY OF PROTECTIVE ORDER
- EXHIBIT 2033

are being served electronically (as consented to by Petitioner), on the 3<sup>rd</sup> day of June, 2014, the same day as the filing of the above-identified documents in the United States Patent and Trademark Office (USPTO), upon:

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