
From: Cunningham, Laura [<mailto:lcunningham@cooley.com>]
Sent: Thursday, May 22, 2014 6:21 PM
To: Hollis, Amanda
Cc: Altieri, Stephen; Graves, Jon; Wang, Jing; z/IPR2014-00003; Holland, Elizabeth; Hardman, Cynthia Lambert; De Vries, Mike W.; Schmidt, Leslie M.; J. Mitchell Jones
Subject: RE: IPR2014-00003: Protective Order

Amanda,

We have accepted your edits and made additional edits in redline. Please provide Aker's position on this draft as soon as possible. While we had hoped the PO could incorporate the parties' agreement regarding at least some specific ITC documents, no such agreement has yet been reached, and we need to get a protective order in place before additional depositions take place to avoid issues such as those we had during yesterday's deposition.

Regards,
Laura

From: Hollis, Amanda [<mailto:ahollis@kirkland.com>]
Sent: Sunday, May 11, 2014 8:25 PM
To: Cunningham, Laura
Cc: Altieri, Stephen; Graves, Jon; Wang, Jing; z/IPR2014-00003; Holland, Elizabeth; Hardman, Cynthia Lambert; De Vries, Mike W.; Schmidt, Leslie M.; J. Mitchell Jones
Subject: RE: IPR2014-00003: Protective Order

Laura,

Attached are our edits to your proposed Protective Order. We do not think a provision allowing counsel access to all confidential ITC trial exhibits is necessary, especially considering that there were many issues and documents in the ITC case that are not relevant to the IPR. Instead we propose that if the parties wish to use confidential documents from the ITC case they attempt to work out an agreement as to those specific documents.

Regards,
Amanda

Amanda Hollis | Kirkland & Ellis LLP
300 North LaSalle | Chicago, IL 60654

312-862-2011 | amanda.hollis@kirkland.com

From: Cunningham, Laura [<mailto:lcunningham@cooley.com>]
Sent: Thursday, May 08, 2014 8:36 AM
To: Hollis, Amanda
Cc: Altieri, Stephen; Graves, Jon; Wang, Jing; z/IPR2014-00003; Holland, Elizabeth; Hardman, Cynthia Lambert; De Vries, Mike W.; Schmidt, Leslie M.; J. Mitchell Jones
Subject: RE: IPR2014-00003: Protective Order

Amanda,

Please let us know when you expect to be able to provide AKBM's position on the proposed protective order. We need to get this in place as soon as possible, and of course, before depositions begin.

Regards,
Laura

From: Cunningham, Laura
Sent: Monday, May 05, 2014 10:24 AM
To: Hollis, Amanda
Cc: Altieri, Stephen; Graves, Jon; Wang, Jing; z/IPR2014-00003; Holland, Elizabeth; Hardman, Cynthia Lambert; De Vries, Mike W.; Schmidt, Leslie M.; J. Mitchell Jones
Subject: IPR2014-00003: Protective Order

Amanda,

Further to the parties' discussions, attached is our proposed draft protective order. Please let us know if this is agreeable to AKBM as soon as possible.

Regards,
Laura

Laura J. Cunningham
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11951 Freedom Drive • Reston, VA 20190-5656
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<< File: Doc#106559479_v2_IPR2014-00003 - Protective Order.DOCX >>

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