

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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APPLE INC.,  
ZTE CORPORATION and ZTE (USA) INC.,  
Petitioners

v.

E-WATCH, INC.  
Patent Owner

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IPR2015-00412  
IPR2015-01366<sup>1</sup>  
U.S. Patent No. 7,365,871 B2

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**JOINT MOTION FOR ENTRY OF THE DEFAULT PROTECTIVE  
ORDER**

Mail Stop  
**Patent Board**  
Patent Trial and Appeal Board  
U.S. Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-1450

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<sup>1</sup> IPR2015-01366 has been joined with IPR2015-00412.

The parties jointly move the Patent Trial and Appeal Board (“PTAB”) to enter a Default Protective Order in this proceeding. The Default Protective Order specifies the conditions under which private, sensitive and/or legally confidential documents and information in possession of the parties must be exchanged, used and protected in this proceeding. As the PTAB previously noted, entry of the Default Protective Order benefits all parties. IPR2015-00412, Paper 27, at 2. Pursuant to the PTAB’s instructions, the parties are also submitting a copy of the Default Protective Order as Exhibit 2011.

DATED: October 14, 2015

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## CERTIFICATE OF SERVICE

The undersigned certifies service pursuant to 37 C.F.R. § 42.6(e) of a copy of this Joint Motion for Entry of the Default Protective Order by electronic mail on October 14, 2015 on the counsel of record for:

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