

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MYLAN PHARMACEUTICALS INC.

Petitioner

v.

YEDA RESEARCH AND DEVELOPMENT CO. LTD.

Patent Owner

Case No. IPR2015-00644

Patent No. 8,399,413

STIPULATED MOTION FOR ENTRY OF PROTECTIVE ORDER

Patent Owner Yeda Research and Development Co. Ltd. (“Yeda”) and Petitioner Mylan Pharmaceuticals Inc. (“Mylan”) request entry of the Board’s Default Protective Order as specified in *Office Trial Practice Guide*, 77 Fed. Reg. 48756, 48771 (Aug. 14, 2012). A copy of the Default Protective Order is attached hereto as Appendix A. The parties do not seek to amend the Default Protective Order and understand that only “confidential information” may be protected from disclosure upon a showing of good cause. 35 U.S.C. §§ 316(a)(1) and 316(a)(7); 37 C.F.R. §§ 42.14 and 42.54(a). The parties respectfully request that the Board enter the proposed Protective Order in this proceeding.

Respectfully submitted,

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Dated: November 20, 2015

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Appendix A

PROTECTIVE ORDER

This standing protective order governs the treatment and filing of confidential information, including documents and testimony.

1. Confidential information shall be clearly marked “PROTECTIVE ORDER MATERIAL.”

2. Access to confidential information is limited to the following individuals who have executed the acknowledgment appended to this order:

(A) *Parties*. Persons who are owners of a patent involved in the proceeding and other persons who are named parties to the proceeding.

(B) *Party Representatives*. Representatives of record for a party in the proceeding.

(C) *Experts*. Retained experts of a party in the proceeding who further certify in the Acknowledgement that they are not a competitor to any party, or a consultant for, or employed by, such a competitor with respect to the subject matter of the proceeding.

(D) *In-house counsel*. In-house counsel of a party.

(E) *Other Employees of a Party*. Employees, consultants or other persons performing work for a party, other than in-house counsel and in-house counsel’s support staff, who sign the Acknowledgement shall be extended access to confidential information only upon agreement of the parties or by order of the

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