UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MYLAN PHARMACEUTICALS INC.

Petitioner

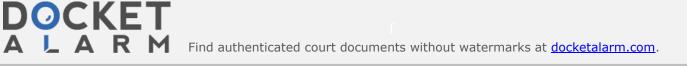
v.

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,

/Elizabeth J. Holland/

Elizabeth J. Holland Registration No. 47,657 GOODWIN PROCTER LLP The New York Times Building 620 Eighth Avenue New York, NY 10019-1405 Tel: 212-813-8800 Fax: 212-355-3333

Dated: November 20, 2015

Counsel for Patent Owner

/Brandon White/

Brandon M. White Registration No. 52,354 PERKINS COIE LLP 700 Thirteenth Street, N.W. Suite 600 Washington, DC 20005-3960 Tel: 202.654.6206 Fax: 202.654.9681

Dated: November 20, 2015

Counsel for Petitioner

DOCKET

ALARM

Appendix A

DOCKET A L A R M Find authenticated court documents without watermarks at <u>docketalarm.com</u>.

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

Δ1

DOCKET A L A R M



Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.