UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

THE MANGROVE PARTNERS MASTER FUND, LTD.,

Petitioner,

v. VIRNETX INC.,

Patent Owner.

Case IPR2015-01046

Patent 6,502,135 B2

MOTION FOR ENTRY OF THE DEFAULT PROTECTIVE ORDER 37 C.F.R. §§ 42.14 AND 42.54

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Pursuant to 37 C.F.R. §§ 42.14, 42.54 and the Board's February 26, 2016

Order (Paper No. 37), Petitioner, THE MANGROVE PARTNERS MASTER

FUND, LTD. ("Petitioner") submits this Motion for Entry of the Default Protective

Order.

DOCKE

The parties have conferred and have agreed to the terms of the Default

Protective Order, submitted herewith as Exhibit 1034.

I. Request For Relief

Petitioner hereby requests entry of the Default Protective Order (Ex. 1034).

Respectfully submitted,

Dated: March 3, 2016

/Abraham Kasdan/

Abraham Kasdan (Reg. No. 32,997) WIGGIN & DANA LLP 450 Lexington Ave., 38th Floor New York, NY 10017 Telephone: (212) 551-2841 Facsimile: (212) 490-0536 Email: akasdan@wiggin.com Motion for Entry of Default Protective Order Case IPR2015-01046 U.S. Patent No. 6,502,135

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies service of the

MOTION FOR ENTRY OF THE DEFAULT PROTECTIVE ORDER 37 C.F.R.

§§ 42.14 AND 42.54 along with EXHIBIT 1034 on the counsel of record for the

Patent Owner by filing this document through the Patent Review Processing

System as well as delivering a copy via electronic mail to the following addresses:

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Naveen Modi naveenmodi@paulhastings.com

Dated: March 3, 2016

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/Abraham Kasdan/ Abraham Kasdan (Reg. No. 32,997) Counsel for Petitioner THE MANGROVE PARTNERS MASTER FUND, LTD.