

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Mylan Pharmaceuticals Inc.,
Petitioner,

v.

Nissan Chemical Industries, Ltd.,
Patent Owner

U.S. Patent No. 5,856,336

Issue Date: January 5, 1999

Title: Quinoline Type Mevalonolactones

Inter Partes Review No. IPR2015-01069

**MOTION TO SEAL AND FOR ENTRY OF DEFAULT PROTECTIVE
ORDER**

Pursuant to 37 C.F.R. § 42.14, Patent Owner, Nissan Chemical Industries, Ltd. (“NCI”) respectfully requests that the Board seal the unredacted version of Exhibit 2031, the September 11, 2015 transcript of the deposition of Thomas W. Jenkins. NCI is concurrently filing a public version of Exhibit 2031 with the confidential information redacted.

Petitioner Mylan Pharmaceuticals Inc. has redacted information from the public version of Exhibit 2031 and requested that the confidential version of this exhibit be filed under seal pursuant to the Board’s Default Protective Order. Nissan does not object to this request or to the use of the default protective order with regard to the real party-in-interest issue and has attached hereto a copy of the Default Protective Order from Appendix B to the Trial Practice Guide.

For the foregoing reasons, NCI respectfully requests that the Board enter an Order sealing the unredacted version of Exhibit 2031 in its entirety.

Dated: September 17, 2015

Respectfully submitted,

NISSAN CHEMICAL INDUSTRIES,
LTD.,

By its attorneys,

/David G. Conlin/

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DEFAULT PROTECTIVE ORDER

Standing 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 party.

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