From:	Hunt, Elisabeth
To:	Steve Sereboff
Cc:	Kala Sarvaiya; Noelle Smith; Giunta, Rich
Subject:	RE: RPX v AIT additional discovery [A213.L15F15]
Date:	Friday, October 30, 2015 11:03:58 AM
Attachments:	Standing Protective Order.pdf

Steve,

Thank you for sending your signed acknowledgment of the protective order. As a reminder, the terms of the order limit access to confidential information to certain individuals (parties, party representatives, experts and in-house counsel) who have executed the acknowledgement. If Kala or others are going to see the confidential information, please have them also execute copies of the acknowledgment page in compliance with the protective order, and return the signed copies to us.

Regards,

Elisabeth Hunt

Wolf, Greenfield & Sacks, P.C.

(617) 646-8443 | (617) 646-8646 fax

From: Steve Sereboff [mailto:SSereboff@socalip.com]
Sent: Thursday, October 29, 2015 6:24 PM
To: Hunt, Elisabeth
Cc: Kala Sarvaiya; Noelle Smith; Giunta, Rich
Subject: RE: RPX v AIT additional discovery [A213.L15F15]

Elisabeth, thanks. Signed doc is attached. /steve/

> **From:** Elisabeth H. Hunt [mailto:Elisabeth.Hunt@WolfGreenfield.com]
> **Sent:** Thursday, October 29, 2015 10:47 AM
> **To:** Steve Sereboff
> **Cc:** Kala Sarvaiya; Noelle Smith; Rich Giunta
> **Subject:** RE: RPX v AIT additional discovery [A213.L15F15]
>
> Steve and Kala,
>
> Attached is the PTAB's default standing protective order. Prior to RPX's production of confidential information in connection with AIT's discovery requests, please have the acknowledgment page executed as required, and return the signed acknowledgments to us.
>
> Regards,
>
> Elisabeth Hunt
>
> Wolf, Greenfield & Sacks, P.C.
>
> (617) 646-8443 | (617) 646-8646 fax

From: Steve Sereboff [mailto:SSereboff@socalip.com]
Sent: Tuesday, October 20, 2015 3:27 PM

To: PTAB Rich Giunta; PTAB Elisabeth Hunt
Cc: Kala Sarvaiya; Anneliese Lomonaco
Subject: RPX v AIT additional discovery [A213.L15F15]

Rich and Elisabeth,

In accordance with the PTAB's order in Case IPR2015-01750, Case IPR2015-01751 and Case
IPR2015-01752, Patent Owner's requests for production are attached. As a courtesy we have
attached a Word version as well.

/Steven C. Sereboff/
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1332 Anacapa St., Suite 201, Santa Barbara, CA 93101
ssereboff@socalip.com

UNITED STATES PATENT AND TRADEMARK OFFICE

_____

BEFORE THE PATENT TRIAL AND APPEAL BOARD

_____

RPX Corporation,
Petitioner

v.

Applications In Internet Time LLC,
Patent Owner

_____

Case IPR2015-01750
Patent 8,484,111 B2

Case IPR2015-01751
Case IPR2015-01752
Patent 7,356,482 B2[1]

_____

STANDING PROTECTIVE ORDER

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[1] The word-for-word identical Standing Protective Order applies to each of the proceedings identified in the heading.

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 Board upon a motion brought by the party seeking to disclose confidential information to that person. The party opposing disclosure to that person shall have the burden of proving that such person should be restricted from access to confidential information.

(F)   *The Office*. Employees and representatives of the Office who have a need for access to the confidential information shall have such access without the requirement to sign an Acknowledgement. Such employees and representatives shall include the Director, members of the Board and their clerical staff, other support personnel, court reporters, and other persons acting on behalf of the Office.

(G)   *Support Personnel*. Administrative assistants, clerical staff, court reporters and other support personnel of the foregoing persons who are reasonably necessary to assist those persons in the proceeding shall not be required to sign an Acknowledgement, but shall be informed of the terms and requirements of the Protective Order by the person they are supporting who receives confidential information.

3.   Persons receiving confidential information shall use reasonable efforts to maintain the confidentiality of the information, including:

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