

EXHIBIT 2

~~DEFAULT~~ UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

EDWARDS LIFESCIENCES CORPORATION, EDWARDS
LIFESCIENCES LLC, AND EDWARDS LIFESCIENCES AG
Petitioners

v.

BOSTON SCIENTIFIC SCIMED, INC.
Patent Owner

Case IPR2017-00060
Patent 8,992,608 B2

[PROPOSED] STIPULATED **PROTECTIVE ORDER**

~~The following Standing Protective Order will be automatically entered into the
proceeding upon the filing of a petition for review or institution of a derivation:~~

~~**Standing Protective Order**~~

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Patent Trial and Appeal Board
U.S. Patent & Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

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

1. Petitioners Edwards Lifesciences Corporation and Edwards Lifesciences LLC (“Edwards”) and Patent Owner Boston Scientific Scimed, Inc. (“Boston Scientific”) are parties to a patent infringement action in the United States District Court for the District of Delaware captioned *Boston Scientific Corp., et al. v. Edwards Lifesciences Corp., et al.*, No. 1:16-cv-275-SLR (the “Delaware Action”). A protective order was entered in the Delaware Action (the “Delaware Protective Order,” attached hereto as Appendix A) that provides for the protection of trade secret, proprietary, and other confidential research, development, financial, business, or commercial information. The protective order permits the parties to use information designated pursuant to the Delaware Protective Order as “CONFIDENTIAL,” “HIGHLY CONFIDENTIAL,” or “HIGHLY CONFIDENTIAL -- ATTORNEYS’ EYES ONLY” (collectively, “Confidential Information”) in *inter partes* review proceedings relating to the patents-in-suit, including U.S. Patent 8,992,608. Edwards and Boston Scientific intend to use such Confidential Information in this *inter partes* review proceeding and desire to protect such information to the same extent that such information is protected by the Delaware Protective Order and in accordance with the rules and guidelines issued by the Patent Trial and Appeal Board (the “Board”).

~~1.2.~~ Any Confidential information ~~Information~~ that a party seeks to use from the Delaware Action for purposes of this proceeding shall be clearly marked “PROTECTIVE ORDER MATERIAL.” Confidential Information designated in the Delaware Action shall continue to be maintained with the original confidentiality designation and shall continue to be subject to the protections provided for in the Delaware Protective Order.

~~2.3.~~ Access to confidential information ~~Confidential Information~~, for purposes of this proceeding, is limited to the following individuals who have executed the acknowledgment appended to this order (including the acknowledgment that they are bound by the prosecution bar set forth in Paragraph 8 of the Delaware Protective Order and the other provisions of the Delaware Protective Order):

(A) Parties. Persons who are owners of a patent involved in the proceeding and other persons who are named parties to the ~~proceeding~~ proceedings, subject to the restrictions in paragraph 3(E) below and only as permitted by the terms of the Delaware Protective Order.

(B) Party Representatives. Representatives of record for a party in the proceeding and outside counsel of record in the Delaware Action who would be permitted access to Confidential Information under the Delaware Protective Order, but only as permitted by the terms of the Delaware Protective Order.

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