

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTEL CORP. and CAVIUM, INC.,
Petitioners,

v.

ALACRITECH, INC.,
Patent Owner

Case IPR2017-01392¹
U.S. Patent No. 7,337,241

JOINT MOTION TO ENTER STIPULATED PROTECTIVE ORDER

¹ Cavium, Inc., which filed a Petition in Case IPR2017-01728, has been joined as a petitioner in this proceeding.

Patent Owner Alacritech, Inc. (“PO”) and Petitioner Intel Corp. (“Petitioner”) submit this Joint Motion to enter a Stipulated Protective Order pursuant to the Board’s email dated March 9, 2018.

In the email, the Board authorized the parties to file a joint motion to enter a Stipulated Protective Order. The Board also ordered PO to submit with the Joint Motion both the Stipulated Protective Order and a marked-up comparison between the Stipulated Protective Order and Default Protective Order showing differences if the parties’ proposed Stipulated Protective Order deviated from the Default Protective Order.

Since the Default Protective Order does not include an outside Attorneys’ Eyes Only designation that is necessary in this case to protect sensitive commercial information, the parties have added an Attorneys’ Eyes Only designation to the Default Protective Order. The parties also adapted the Default Protective order in certain minor ways so that it is consistent with the protective order entered in the corresponding District Court case.

Accordingly, PO hereby submits the Stipulated Protective Order as Exhibit 2400 and a marked-up comparison of the Stipulated and Default Protective Orders showing differences as Exhibit 2401. PO respectfully requests that the Board enter the Stipulated Protective Order. Petitioner does not oppose this request and joins in the present Motion.

Date: March 15, 2018

Respectfully submitted,

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned hereby certify that JOINT MOTION TO ENTER STIPULATED PROTECTIVE ORDER, and all exhibits and other documents filed together with the preliminary response, were served on March 15, 2018 by filing these documents through the Patent Review Processing System, as well as by e-mailing copies to:

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