## UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD

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UNIFIED PATENTS INC.
Petitioner

v.

FALL LINE PATENTS, LLC
Patent Owner

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Case IPR2018-00043 Patent 9,454,748

JOINT MOTION FOR PROTECTIVE ORDER



The parties jointly request the entry of a protective order. The parties have conferred and agreed to the terms of the default Protective Order, which is attached as Attachment A.

Dated: February 22, 2019 Respectfully submitted,

<u>/Michael D. Ellis/</u>
Michael D. Ellis
Reg. No. 72,628
Counsel for Patent Owner



## **CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6, the undersigned certifies that on February 22,

2019, the foregoing document was served via email on counsel for Petitioner:

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## **ATTACHMENT A**



#### **DEFAULT 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) <u>Parties</u>. Persons who are owners of a patent involved in the proceeding and other persons who are named parties to the proceeding.
  - (B) <u>Party Representatives</u>. Representatives of record for a party in the proceeding.
  - (C) <u>Experts</u>. 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) <u>In-house counsel</u>. 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) <u>The Office</u>. Employees and representatives of the Office who have a need



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