

From: [john harrop](#)
To: [Trials](#)
Cc: [Cecil Key; jay.jaykesan.com; McCombs, David L.; O'Dell, David M.; Kelton, Thomas; "Jonathan Stroud \(jonathan@unifiedpatents.com\)"](#)
Subject: Request for Entry of Default Protective Order
Date: Thursday, February 14, 2019 4:44:16 PM

Your Honors:

Pursuant to the Board's Order dated February 8, 2019 (Paper 65), Patent Owner and Petitioner hereby jointly request entry of a protective order governing the submission of certain materials designated as confidential and filed in this proceeding (*see* Paper 59). Specifically, the Parties jointly request automatic entry of the Default Protective Order set forth in Appendix B to the Trial Practice Guide, 77 Fed. Reg. 157, 48769-48771 (Aug. 4, 2012). The Parties further jointly request that Paper 59 be treated as confidential pursuant to the Default Protective Order.

The Parties believe that the requested entry of the Default Protective Order adequately addresses the issues raised in the Board's Order regarding the scope and precision of the Protective Order language in this proceeding. However, the Parties remain available to submit a formal motion through the E2E system should the Board desire and/or to provide any additional information the Board may request. The Parties are also available for a call at any time on Tuesday or Wednesday of next week (February 19 or 20) should the Board desire to speak with the Parties.

Respectfully submitted,

John Harrop
Attorney for Patent Owner
PO Box 320171
Alexandria, VA 22320
1-202-230-6480