

Joint Motion for Protective Order, Case No. IPR2018-00067  
U.S. Patent No. 8,577,813

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

UNIFIED PATENTS INC.  
*Petitioner,*

v.

UNIVERSAL SECURE REGISTRY LLC  
*Patent Owner*

---

Case IPR2018-00067  
U.S. Patent No. 8,577,813

---

**JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER**

**I. RELIEF REQUESTED.**

Pursuant to the Board’s Scheduling Order in the above-captioned matter (Paper 16 at 2), Petitioner Unified Patents, Inc. (“Unified”) and Patent Owner Universal Secure Registry LLC (“USR”) hereby submit this Joint Motion for Entry of Protective Order. The parties have agreed to the [Proposed] Stipulated Protective Order (“Proposed SPO”) submitted herewith as Exhibit 2001. The Proposed SPO is a slightly revised version of the Board’s Default Protective Order, as indicated by the redlined comparison submitted as Exhibit 2002. The parties respectfully request that the Board enter the Proposed SPO in this proceeding. The Board provided authorization for filing this motion via e-mail dated August 20, 2018.

**II. GOOD CAUSE EXISTS FOR THE BOARD TO ENTER THE PROPOSED PROTECTIVE ORDER.**

The Proposed SPO is a revised version of the Board’s Default Protective Order, containing a few small revisions.

First, it has been revised to include a “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY,” such that competitively sensitive information will be shielded from disclosure to the opposing party’s officers or employees.

Second, it provides that to the extent information is made available for inspection, those items need not be marked with a confidentiality designation until the item is copied. The default protective order does not include a provision

specifically addressing materials made available for inspection, and the procedure here provide an efficient manner of designation.

Third, it provides that the parties should meet and confer in good faith if there is a disagreement on confidentiality designations, which will help ensure the parties do not burden the Board unnecessarily.

Fourth, it provides small revisions to the provisions relating to who may view confidential materials, including provisions relating to outside counsel being permitted to view the materials and placing a limit on the number of employees of a party that may view the materials. These small revisions are designed to avoid inadvertent disclosure of confidential materials.

Fifth, it provides that privileged materials may be redacted from documents that are produced and that confidential materials will only be used for this proceeding, in order to protect confidential materials and privileged information.

To protect the parties' confidential information and to promote efficiency in the resolution of their dispute, the parties submit that good cause exists for the Board to enter the proposed Protective Order.

### **III. CONCLUSION**

For the foregoing reasons, the parties respectfully request that the Board grant this motion and enter the [Proposed] Stipulated Protective Order (Ex. 2001) in this proceeding.

Joint Motion for Protective Order, Case No. IPR2018-00067  
U.S. Patent No. 8,577,813

Date: August 21, 2018

Respectfully submitted,

By: /s/ James M. Glass, Reg. No. 46,729  
James M. Glass (Reg. No. 46,729)  
QUINN EMANUEL URQUHART &  
SULLIVAN, LLP  
51 Madison Avenue, 22<sup>nd</sup> Floor  
New York, NY 10010  
Tel: (212) 849-7000  
Fax: (212) 849-7100  
Email: jimglass@quinnemanuel.com

*Lead Attorney for Patent Owner –  
Universal Secure Registry LLC*

*BY: /s/ Jason R. Mudd*  
Jason R. Mudd, Reg. No. 57,700  
Roshan Mansinghani, Reg. No. 62,429  
Eric A. Buresh, Reg. No. 50,394  
Jonathan Stroud, Reg. No. 72,518

*ATTORNEYS FOR PETITIONER*

**CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6(e), the undersigned hereby certify that this JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER was served on August 21, 2018 by filing these documents through the Patent Review Processing System, as well as by e-mailing copies to attorneys of record, including:

- [jimglass@quinnemanuel.com](mailto:jimglass@quinnemanuel.com)
- [nimahefazi@quinnemanuel.com](mailto:nimahefazi@quinnemanuel.com)
- [chrismathews@quinnemanuel.com](mailto:chrismathews@quinnemanuel.com)
- [tigranguledjian@quinnemanuel.com](mailto:tigranguledjian@quinnemanuel.com)
- [richardlowry@quinnemanuel.com](mailto:richardlowry@quinnemanuel.com)
- [jason.mudd@eriseip.com](mailto:jason.mudd@eriseip.com)
- [eric.buresh@eriseip.com](mailto:eric.buresh@eriseip.com)
- [ptab@eriseip.com](mailto:ptab@eriseip.com)
- [roshan@unifiedpatents.com](mailto:roshan@unifiedpatents.com)
- [jonathan@unifiedpatents.com](mailto:jonathan@unifiedpatents.com)

Date: August 21, 2018

By: /s/ Nima Hefazi\_\_\_\_\_