

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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GOOGLE LLC, ZTE (USA), INC.,  
SAMSUNG ELECTRONICS CO., LTD.,  
LG ELECTRONICS INC., HUAWEI DEVICE USA, INC.,  
HUAWEI DEVICE CO. LTD., HUAWEI TECHNOLOGIES CO. LTD.,  
HUAWEI DEVICE (DONGGUAN) CO. LTD.,  
HUAWEI INVESTMENT & HOLDING CO. LTD.,  
HUAWEI TECH. INVESTMENT CO. LTD., and  
HUAWEI DEVICE (HONG KONG) CO. LTD.,  
Petitioner

v.

CYWEE GROUP LTD.,  
Patent Owner.

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Case IPR2018-01257  
U.S. Patent No. 8,552,978

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**JOINT MOTION TO MODIFY DEFAULT PROTECTIVE ORDER**

The Parties have conferred and jointly request entry of the attached Protective Order to modify the Default Protective Order. The Parties have agreed to this modified Protective Order.

Attachment A is the agreed upon modified Protective Order. Attachment B is a red-line version of the modified Protective Order showing changed from the Default Protective Order.

This Motion accompanies Patent Owner's Motion to Seal Ex. 2031 (Paper 47) as HIGHLY CONFIDENTIAL PROTECTIVE ORDER MATERIAL.

Date: August 13, 2019

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*Counsel for Patent Owner  
Cywee Group Ltd.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing Stipulation Modifying Scheduling Order was served by electronic mail on Tuesday, August 13, 2019, on all counsel of record at the United States Patent & Trademark Office.

Date: August 13, 2019

/Jay P. Kesan/  
Jay P. Kesan  
Reg. No. 37,488

*Counsel for Patent Owner  
Cywee Group Ltd.*

**ATTACHMENT A**

UNITED STATES PATENT AND TRADEMARK OFFICE

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HUAWEI DEVICE (HONG KONG) CO. LTD.,  
Petitioner

v.

CYWEE GROUP LTD.,  
Patent Owner.

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Case IPR2018-01257 (Patent 8,552,978 B2)  
Case IPR2018-01258 (Patent 8,441,438 B2)

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**PROTECTIVE ORDER**

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

1. Confidential information shall be clearly marked “PROTECTIVE ORDER MATERIAL” or “HIGHLY CONFIDENTIAL PROTECTIVE ORDER MATERIAL.” Confidential information marked “HIGHLY CONFIDENTIAL PROTECTIVE ORDER MATERIAL” shall include any confidential information contained in Exhibit 2031 (even if not marked as such).

2. Access to another party’s confidential information marked “PROTECTIVE ORDER MATERIAL” is limited to the following individuals who have executed the acknowledgment appended to this order:

(A) Parties. Persons who are owners of a patent involved in the proceeding and other persons who are named parties to the proceeding.

(B) Party Representatives. Representatives of record for a party in the proceeding.

(C) Experts. Retained experts of a party in the proceeding who further certify in the Acknowledgement that they are not a competitor to any party, and other than work as an independent expert regarding U.S. Patents 8,552,978 and 8,441,438, are not a consultant for, or employed by, such a competitor with respect to the subject matter of the proceeding.

(D) In-house counsel. In-house counsel of a party.

(E) Support Personnel. Administrative assistants, clerical staff, court reporters and other support personnel (excluding patent agents and technical advisors, any of whom are substantively involved in the merits of the proceeding) of the foregoing persons who are reasonably necessary to assist those persons in the proceeding shall not be required to sign an Acknowledgement, but shall be informed of the terms and requirements of the Protective Order by the person they are supporting who receives confidential information.

(F) The Office. Employees and representatives of the United States Patent and Trademark Office who have a need for access to the confidential information shall have such access without the requirement to sign an Acknowledgement. Such employees and representatives shall include the Director, members of the Board and their clerical staff, other support personnel, court reporters, and other persons acting on behalf of the Office.

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