UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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ZTE (USA) INC.,

PETITIONER,

V.

BELL NORTHERN RESEARCH, LLC,

PATENT OWNER.

_____

Case No. IPR2019-01365
U.S. Patent No. 7,039,435

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**PATENT OWNER'S UNOPPOSED MOTION FOR ENTRY OF A
MODIFIED PROTECTIVE ORDER**

I. INTRODUCTION

Patent Owner Bell Northern Research, LLC respectfully submits this Unopposed Motion for Entry of a Modified Protective Order.

Patent Owner requests that the Board enter the Modified Protective Order attached hereto as Addendum A. A redline version showing differences between the Default Protective Order and the proposed Modified Protective Order is attached hereto as Addendum B.

II. REQUESTED RELIEF

Based on Patent Owner's intent to submit to the Board certain third-party license agreements, and subject to any order entered by the Board granting a motion for additional discovery, good cause exists to enter the attached Modified Protective Order (Addendum A) to protect the third-party confidential business information that Patent Owner intends to submit.

The Modified Protective Order differs from the Default Protective Order in three ways. First, the Modified Protective Order requires confidential information requiring additional confidentially restrictions to be clearly marked as "PROTECTIVE ORDER MATERIAL – ATTORNEYS EYES ONLY." Secondly, the Modified Protective Order details who may access the PROTECTIVE ORDER MATERIAL-ATTORNEYS EYES ONLY information. Lastly, the Modified Protective Order details, for persons receiving PROTECTIVE ORDER

MATERIAL-ATTORNEYS EYES ONLY information, the procedures necessary to maintain the confidentiality of the information.

Accordingly, these modifications to the Default Protective Order are justified due to the need to protect third-party confidential business information.

III. CONCLUSION

For the foregoing reasons, Patent Owner respectfully requests that the Board accept and enter the Modified Protective Order submitted herewith as Addendum A.

Dated: April 14, 2020

Respectfully Submitted,

/Steven W. Hartsell/
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CERTIFICATE OF SERVICE

I hereby certify that I caused to be served on the counsel for Petitioners a

true and correct copy of the foregoing Unopposed Motion for Entry of a Modified

Protective Order, by electronic means on April 14, 2020 at the following addresses

of record:

Amol A. Parikh
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Dated: April 14, 2020   Respectfully Submitted,

                                                     /Steven W. Hartsell/
                                                     Steven W. Hartsell
                                                     Counsel for Patent Owner

ADDENDUM A

DOCKET ALARM

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