IPR2020-00034 U.S. Patent No. 8,023,580

### UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

**APPLE INC.,** 

Petitioner,

v.

#### **REMBRANDT WIRELESS TECHNOLOGIES, LP,**

Patent Owner.

Case IPR2020-00034

U.S. Patent No. 8,023,580

# NOTICE REGARDING AGREEMENT TO ACCEPT THE TERMS OF DEFAULT PROTECTIVE ORDER

Pursuant to Petitioner's Motion to Seal (Paper 4), Petitioner hereby notifies the Board that Petitioner and Patent Owner have conferred and Petitioner and Patent Owner agree to accept the terms of the Default Protective Order provided in the Trial Practice Guide Update (July 2019), Appendix B for Exhibit 1133 and the designated portion of the Petition discussing Exhibit 1133. Accordingly, Petitioner respectfully requests the Board enter the Default Protective Order provided in the Trial Practice Guide Update (July 2019), Appendix B, and grant Petitioner's Motion to Seal (Paper 4).

> Respectfully submitted, ROPES & GRAY LLP

Dated: December 5, 2019

Mailing address for all PTAB correspondence: **ROPES & GRAY LLP** IPRM – Floor 43 Prudential Tower 800 Boylston Street Boston, MA 02199-3600 /Gabrielle E. Higgins/ Mark D. Rowland Registration No. 32,077 Gabrielle E. Higgins Registration No. 38,916 **ROPES & GRAY LLP** 1900 University Avenue, 6th Floor East Palo Alto, CA 94303 Phone: 650-617-4000 Facsimile: 650-617-4090 mark.rowland@ropesgray.com gabrielle.higgins@ropesgray.com

ATTORNEYS FOR PETITIONER APPLE INC.

## **CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing NOTICE REGARDING AGREEMENT TO ACCEPT THE TERMS OF DEFAULT PROTECTIVE ORDER was served on December 5, 2019 in its entirety by causing the aforementioned document to be electronically mailed, pursuant to the parties' agreement to the following attorneys of record for the Patent Owner listed below:

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## **ROPES & GRAY LLP**

Dated: December 5, 2019

By: <u>/Crena Pacheco/</u> Name: Crena Pacheco