

Filed: March 5, 2021

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

MYLAN INSTITUTIONAL LLC and PFIZER INC.,

Petitioners,

v.

NOVO NORDISK A/S,

Patent Owner.

---

Case No. IPR2020-00324<sup>1</sup>

U.S. Patent No. 8,114,833

---

**PETITIONERS' MOTION TO SEAL**

---

<sup>1</sup> IPR2020-01252 has been joined with this proceeding.

On September 18, 2020, Patent Owner filed its Patent Owner Response (Paper No. 20) accompanied by a motion to seal (Paper No. 22), explaining that the Patent Owner Response and certain Exhibits disclosed confidential information. The motion to seal explained Patent Owner's position as to why good cause exists to seal certain Exhibits and portions of the Patent Owner Response.

Petitioners have filed concurrently with this motion a sealed version of *Petitioners' Motion to Exclude Evidence* ("Motion") as this Motion discusses material designated as "CONFIDENTIAL - PROTECTIVE ORDER MATERIAL" by Patent Owner. Petitioners submit that good cause exists for placing the Motion under seal because Patent Owner has contended this information should be sealed according to the reasons set forth in Paper No. 22. Petitioners take no position as to the whether the underlying information satisfies the Board's requirements for filing under seal, as it is Patent Owner that has asserted the confidentiality of these exhibits.

For the above reasons, Petitioners request that the Motion be placed and maintained under seal. Petitioners will file redacted versions of the Motion shortly hereafter after conferring with Patent Owner. For the foregoing reasons, Petitioners respectfully request that the Board grant this motion to seal and for entry of a protective order.

Dated: March 5, 2021

*/s/ Lara J. Dueppen*

Lara J. Dueppen

Reg. No. 65,002

*Counsel for Petitioner Mylan  
Institutional LLC*

**CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6(e), I certify that I caused to be served a true and correct copy of the foregoing: *Petitioners' Motion to Seal* by email to the electronic service addresses for Patent Owner and Petitioner Pfizer Inc.:

Jeffrey Oelke  
Laura T. Moran  
Ryan P. Johnson  
FENWICK & WEST LLP  
*joelke@fenwick.com*  
*laura.moran@fenwick.com*  
*ryan.johnson@fenwick.com*  
*Novo833IPR@fenwick.com*

***Counsel for Patent Owner***

Thomas J. Meloro  
Michael W. Johnson  
WILLKIE FARR & GALLAGHER LLP  
*tmeloro@willkie.com*  
*mjohnson1@willkie.com*

***Counsel for Petitioner Pfizer Inc.***

Dated: March 5, 2021

*/s/ Lara J. Dueppen*

---

Lara J. Dueppen  
Reg. No. 52,354

*Counsel for Petitioner Mylan  
Institutional LLC*