

From: [Joe Edell](#)
To: [Trials](#)
Cc: [Allan Bullwinkel](#); [Michael Heim](#); [McKeown, Scott](#); [Rowland, Mark D.](#); [Radsch, Andrew](#); [Batchelder, James R.](#); [Adam Allgood](#)
Subject: IPR2020-00335-00338 & IPR2020-00485-00486
Date: Monday, July 6, 2020 10:21:26 AM

Trials:

In view of Patent Owner's reliance on Dr. Kevin Almeroth in its Patent Owner's Preliminary Responses in IPR2020-00335, -00336, -00337, -00338, -00339, -00485, and -00486, Petitioner Juniper Networks seeks authorization from the assigned panel to file a 15-page page motion to disqualify Dr. Almeroth from the ongoing IPRs. Juniper previously retained Dr. Almeroth and supplied him with confidential and privileged information relevant to these IPRs. Juniper has filed a motion to disqualify Dr. Almeroth in the district court case, which remains pending (Dkt. No. 55 in *Packet Intelligence LLC v. Juniper Networks, Inc.*, Case No. 3:19-cv-04741-WHO (N.D. Cal.)). Juniper is amenable to filing the motion to disqualify Dr. Almeroth at this point in the IPR proceedings or waiting until after a decision is made regarding institution, whichever the assigned panel prefers. Juniper also anticipates that it will need to file confidential information along with its motion and seeks authorization to file a Protective Order allowing confidential information to be designated as Attorneys' Eyes Only.

Juniper has conferred with Patent Owner's counsel. During that conference, Juniper proposed that the parties agree to be bound by the district court's ruling on this issue. Patent Owner did not agree to this proposal. Patent Owner also did not agree to Juniper's requests for authorization to file the motion to disqualify or to enter a protective order.

A conference call is requested to resolve these issues. The parties have conferred and are available July 13 (11am-3pm ET), and can confer on additional times next week if the Board prefers.

Best regards,
Joe Edell
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