

## Stavinoha, Clarke

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**From:** Trey Powers <TPOWERS@sternekessler.com>  
**Sent:** Friday, June 11, 2021 4:10 PM  
**To:** Stavinoha, Clarke; Mark Walters; Jason Fitzsimmons; Steve Merrill; bamert@lowegrahamjones.com; PTAB Account  
**Cc:** Wille, David; Walters, Chad; jperkins@perkinsip.com; PTAB Account; PTAB Account  
**Subject:** RE: IPR2020-01139, -01142 - Petitioner's Opposition to Patent Owner's Motion for Entry of Modified Protective Order

[EXTERNAL EMAIL]

Clarke,

To our knowledge, you never inquired into the status of Yita's in-house counsel or plans to obtain in-house counsel in any previous discussions. In any event, whether Yita currently has in-house counsel or not is irrelevant to MacNeil's attempts to exclude "Parties" from MacNeil's proposed modified protective order. We note again that MacNeil moved to enter its modified protective order without meaningful discussion with Yita. And Yita is well-within its right to oppose a protective order that would prevent any Yita in-house counsel, now or in the future, from accessing MacNeil information alleged to be material to patentability.

Regards,  
Trey

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**From:** Stavinoha, Clarke <clarke.stavinoha@BakerBotts.com>  
**Sent:** Wednesday, June 9, 2021 11:26 AM  
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**Cc:** Wille, David <david.wille@bakerbotts.com>; Walters, Chad <chad.walters@bakerbotts.com>; jperkins@perkinsip.com; PTAB Account <PTAB@sternekessler.com>; PTAB Account <PTAB@sternekessler.com>  
**Subject:** IPR2020-01139, -01142 - Petitioner's Opposition to Patent Owner's Motion for Entry of Modified Protective Order

**EXTERNAL EMAIL:** Use caution before clicking links or attachments.

Mark,

Your opposition papers refer to in-house counsel for Yita. You have never mentioned any in-house counsel for Yita previously during our discussions of the protective order. Nor do you identify any in-house counsel in your papers. Who is the in-house counsel?

Thanks

Clarke

**Clarke Stavinoha**

Senior Associate

**Baker Botts L.L.P.**

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