

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TENNANT COMPANY,

Petitioner,

v.

OXYGENATOR WATER TECHNOLOGIES, INC.,

Patent Owner.

Case IPR2021-00625

Patent RE45415

MOTION FOR ENTRY OF PROTECTIVE ORDER

Unopposed Motion for Entry of a Protective Order

Pursuant to 37 CRF § 42.54, Patent Owner, Oxygenator Water Technologies, Inc., respectfully submits this Unopposed Motion for Entry of a Protective Order in this proceeding. The parties have conferred and agreed to entry of a Protective Order and to the terms of the Protective Order (“Proposed Protected Order”). A clean version (Ex. 2113) of the Proposed Protective Order and a marked-up comparison (Ex. 2114) of the Proposed Protective Order to the Default Protective Order are submitted herewith. The Proposed Protective Order is the same as the Default Protective Order except that section 2(B) has been replaced to clarify that employees of the law firms of attorneys of record are allowed access to confidential information.

Unless subsequently modified by the Board, the Proposed Protective Order will cover confidential information submitted and sealed by the Board in conjunction with a Motion to Seal in this proceeding. Good cause exists for the Board to enter the Proposed Protective Order to protect the parties’ confidential information and promote efficiency in resolution of the dispute.

Conclusion

For the foregoing reasons, the Patent Owner respectfully request that the Board grant this motion and enter the Proposed Protective Order (Ex. 2113) in this proceeding.

Dated: September 22, 2021

Respectfully submitted,

/s/ J. Derek Vandenburg

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CERTIFICATION OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e) and the agreement of the parties, the undersigned certifies that on September 22, 2021, a true and correct copy of the foregoing was served via electronic mail upon the following:

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/s/ J. Derek Vandenburg
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