UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CURRENT LIGHTING SOLUTIONS, LLC
D/B/A GE CURRENT

Petitioner,

v.

JIAXING SUPER LIGHTING ELECTRIC APPLIANCE CO., LTD.

Patent Owner.

Case No. IPR2023-00269

Patent No. 10,560,989

JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

Petitioner Current Lighting Solutions, LLC D/B/A GE Current and Patent Owner Jiaxing Super Lighting Electric Appliance Co., Ltd. hereby move for entry of a stipulated protective order.

In connection with the above-captioned case, Patent Owner has requested certain discovery from Petitioner and Petitioner has agreed to produce certain discovery upon entry of an appropriate protective order. Petitioner prepared the proposed protective order attached hereto as Exhibit 2001. The proposed protective order is based on the Board's default protective order but includes certain modifications as shown by the redline version attached hereto as Exhibit 2002. Chiefly, the proposed protective order (1) adds an "OUTSIDE COUNSEL ONLY" designation for confidential information "that has not been made publicly available and that is competitively sensitive—i.e., if disclosed, could reasonably be used to inform or guide business decisions that would compete with or otherwise harm the designating party," and (2) clarifies procedures for disclosure to Party Experts. *See* Ex. 2001 at 2-4.

The Board's Consolidated Trial Practice Guide ("CTPG") states that "[t]he parties are encouraged to agree on the entry of a stipulated protective order." CTPG (Nov. 2019) at p. 107. Further, the CTPG notes that the Board "will generally accept such proposed changes if they are consistent with the integrity

and efficient administration of the proceedings," and will accept additional categories of confidentiality if "they are reasonable and adequately define what types of materials are to be included in the additional categories." *Id*. at 115-116. Here, the Parties have agreed on the entry of the attached stipulated protective order that is believed to be "consistent with the integrity and efficient administration of proceedings" and adequately defines the "types of materials [] to be included" in the OUTSIDE COUNSEL ONLY designation.

The Board authorized the parties to file a motion for entry of a proposed protective order via email on March 31, 2023.

Dated: April 3, 2023

Respectfully submitted,

/Eagle H. Robinson/

Lead Counsel
Eagle H. Robinson, Reg. No. 61,361

Back-Up Counsel
Arthur P. Licygiewicz (pending *pro hac vice)*
Catherine J. Garza, Reg. No. 62,149
Valerie K. Barker, Reg. No. 73,080

NORTON ROSE FULBRIGHT US LLP
98 San Jacinto Boulevard, Suite 1100
Austin, Texas 78701
Tel: (858) 720-5700

Attorneys for Petitioner
Current Lighting Solutions LLC d/b/a GE Current

Dated: April 3, 2023

Respectfully submitted,

/Patrick J. McKeever/

Lead Counsel
Patrick J. McKeever, Reg. No. 66,019

Back-Up Counsels
Miguel Bombach, Reg. No. 68,636'
Matthew C. Bernstein (pro hac vice)
Evan Day, Reg. No. 75,992
Han-Wei Chen, Reg. No. 75,350
Wei Yuan, Reg. No. 71,772

PERKINS COIE LLP
11452 El Camino Real, Suite 300
San Diego, California 92130
Tel: (858) 720-5700

Attorneys for Patent Owner
Jiaxing Super Lighting Electric Appliance Co., Ltd.

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of April 2023, true and correct copies of the JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER AND EXHIBITS 2001-2002 were served via electronic mail upon the following counsel of record for Petitioner:

Eagle H. Robinson
eagle.robinson@nortonrosefulbright.com
Arthur P. Licygiewicz
art.licygiewicz@nortonrosefulbright.com
Catherine J. Garza
Cat.garza@nortonrosefulbright.com
Valerie Barker
valerie.barker@nortonrosefulbright.com

Norton Rose Fulbright US LLP
98 San Jacinto Boulevard, Suite 1100
Austin, TX 78701

Dated: April 3, 2023

/Kristina Grauer/
Kristina Grauer
Paralegal