

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VIKING DRILL & TOOL, INC.
Petitioner,

v.

HONGJIA WANG
Patent Owner.

Case IPR2023-00473
U.S. Patent No. 11,007,583

**PETITIONER'S UNOPPOSED MOTION TO EXPUNGE AND REFILE
PAPER NO. 69 UNDER SEAL**

I. Relief Requested

Pursuant to the Board’s April 10, 2024 authorization, 37 C.F.R. § 42.5, and the agreement of the Parties, Petitioner Viking Drill & Tool, Inc. (“Viking”) respectfully requests that the Board expunge Paper No. 69 (Petitioner’s Reply to Patent Owner’s Opposition to Petitioner’s Motion to Exclude), which was inadvertently filed without redacting certain information that has been designated as confidential under the Board’s Protective Order (Paper No. 27). Petitioner is filing a redacted, public version of Paper No. 69, an unredacted under-seal version of Paper No. 69, and a motion to seal Paper No. 69 concurrently with this Motion.

II. Reasons for Granting Relief

Counsel for Petitioner certifies that it has conferred with counsel for Patent Owner Hongjia Wang (“Patent Owner”) regarding the relief sought. Patent Owner has consented to Viking’s expunging and refile of Paper No. 69. As such, Mr. Wang does not oppose this Motion.

III. Conclusion

Petitioner respectfully requests that the Board grant this Unopposed Motion to Expunge and Refile Paper No. 69 Under Seal.

Respectfully submitted,

Date: April 10, 2024

/J. Derek Vandenburg/

J. Derek Vandenburg (Lead Counsel)

Reg. No. 32,179

Iain A. McIntyre, Reg. No. 40,337

Mitchell R. Williams, Reg. No. 74,776

Saukshmya Trichi, *pro hac vice*

Katherine Chen, *pro hac vice*

Carlson, Caspers, Vandenburg &

Lindquist, P.A.

225 South Sixth Street, Suite 4200

Minneapolis, MN 55402

Telephone: (612) 436-9600

Facsimile: (612) 436-9650

dvandenburg@carlsoncaspers.com

imcintyre@carlsoncaspers.com

mwilliams@carlsoncaspers.com

strichi@carlsoncaspers.com

kchen@carlsoncaspers.com

Attorneys for Petitioner

CERTIFICATE OF SERVICE

I certify that on April 10, 2024, I caused a true and correct copy of the foregoing **Petitioner's Unopposed Motion to Expunge and Refile Paper No. 69 Under Seal** to be served via electronic mail on the following:

Kelly W. Cunningham (Lead Counsel)
Reg. No. 43,750
Aaron P. McGushion, Reg. No. 53,300
Ervin Cohen & Jessup LLP
9401 Wilshire Blvd., 12th Floor
Beverly Hills, CA 90212
United States
kcunningham@ecjlaw.com
aaron@mcgushion.com

Date: April 10, 2024

/J. Derek Vandenburg/
J. Derek Vandenburg (Lead Counsel)
Reg. No. 32,179
Iain A. McIntyre, Reg. No. 40,337
Mitchell R. Williams, Reg. No. 74,776
Saukshmya Trichi, *pro hac vice*
Katherine Chen, *pro hac vice*
Carlson, Caspers, Vandenburg &
Lindquist, P.A.
225 South Sixth Street, Suite 4200
Minneapolis, MN 55402
Telephone: (612) 436-9600
Facsimile: (612) 436-9650
dvandenburg@carlsoncaspers.com
imcintyre@carlsoncaspers.com
mwilliams@carlsoncaspers.com
strichi@carlsoncaspers.com
kchen@carlsoncaspers.com

Attorneys for Petitioner