

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VIKING DRILL & TOOL, INC.
Petitioner

v.

HONGJIA WANG
Patent Owner

Case IPR2023-00474

U.S. Patent No. 11,007,583

MOTION FOR ENTRY OF PROTECTIVE ORDER

Unopposed Motion for Entry of a Protective Order

Pursuant to 37 CFR § 42.54, Petitioner, Viking Drill & Tool, 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 Protective Order”). A clean version (Ex. 1028) of the Proposed Protective Order and a marked-up comparison (Ex. 1029) of the Proposed Protective Order to the Default Protective Order are submitted herewith. A copy of the Amended Protective Order (ECF No. 126) entered in *Tsteigen, Inc. et al. v. Viking Drill & Tool, Inc.*, Case No. 0:21-cv-02759 JWB/JFD (D. Minn.) (“Related Proceeding”) is also submitted herewith as Ex. 1030.

The Proposed Protective Order is the same as the Default Protective Order except for three additions. First, in view of the parties’ agreement to use information disclosed in the Related Proceeding in accordance with the Amended Protective Order entered therein, the Proposed Protective Order includes additional confidentiality designation, “PROTECTIVE ORDER MATERIAL—ATTORNEY’S EYES ONLY” and provisions related thereto. Second, because of the parties’ agreement to use information disclosed in the Related Proceeding in accordance with the Amended Protective Order entered therein, the Proposed Protected Order provides for the destruction of confidential documents at a date

after final disposition of this action or the Related Proceeding, whichever is later. Finally, the Proposed Protected Order provides for providing a copy of the signed acknowledgement to the other party.

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 Petitioner respectfully requests that the Board grant this motion and enter the Proposed Protective Order (Ex. 1028) in this proceeding.

Dated: October 20, 2023

Respectfully submitted,

/s/ Mitchell R. Williams

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CERTIFICATE OF SERVICE

I certify that on October 20, 2023, I caused a true and correct copy of the foregoing Motion for Entry of Protective Order to be served via electronic mail on the following:

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