

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

QUASAR SCIENCE LLC
Petitioner,

v.

COLT INTERNATIONAL CLOTHING, INC. d/b/a COLT LED
Patent Owner.

Case: IPR2023-00611
U.S. Patent No. 10,197,224

JOINT MOTION FOR ENTRY OF MODIFIED PROTECTIVE ORDER

LISTING OF EXHIBITS

Exhibit No.	Exhibit Description
1001	U.S. Patent No. 10,197,224 to Macias <i>et al.</i> (“the ’224 Patent”)
1002	File History of the U.S. Patent No. 10,197,224 (“the File History”)
1003	Declaration of Fred Holmes (“Holmes Decl.”)
1004	U.S. Patent No. 7,507,001 to Kit (“Kit”)
1005	U.S. Patent No. 7,350,936 to Ducharme <i>et al.</i> (“Ducharme”)
1006	U.S. Patent Publication 2005/0047134 to Mueller (“Mueller”)
1007	U.S. Patent No. 8,026,532 to Ansems (“Ansems”)
1008	U.S. Publication No. 2010/0102960 to Ivey <i>et al.</i> (“Ivey”)
1009	U.S. Patent No. 8,668,361 to Hasnain (“Hasnain”)
1010	U.S. Publication No. 2010/0102729 to Katzir <i>et al.</i> (“Katzir”)
1011	“When white light isn’t white” by Mike Wood, 2008
1012	U.S. Publication No. 2004/0052076 to Mueller <i>et al.</i> (“Mueller ’076”)
1013	International Publication No. 2005/012997 to Morgan <i>et al.</i> (“Morgan”)
1014	U.S. Publication No. 2010/0315001 to Domagala <i>et al.</i> (“Domagala”)

1015	U.S. Patent. No. 7,049,761 to Timmermans <i>et al.</i> (“Timmermans”)
1016	Astera LED-Technology User Manual Wireless Pixel Tube (AL1) v.3.2.20 (July 23, 2010)
1017	Declaration of K. Gottuso in support of Petitioner’s Objection to Evidence
1018	October 26, 2023 Email from Hoffman to MBGW Law and Craig Bailey
1019	Email thread between Petitioner and Patent Owner regarding Patent Owner’s Motion for Additional Discovery
1020	Redline Comparison of Proposed Modified Protective Order to Board’s Default Protective Order from the November 2019 Trial Practice Guide
1021	Proposed Modified Protective Order

Pursuant to 35 U.S.C. § 316(a)(7) and 37 C.F.R. § 42.54, Petitioner Quasar Science LLC and Patent Owner Colt International Clothing, Inc. d/b/a Colt LED (collectively, “the Parties”) jointly move for entry of the Proposed Modified Protective Order attached hereto as Exhibit 1021.¹

The Parties have met and conferred on revisions to the Default Protective Order available in the November 2019 version of the Patent Trial and Appeal Board Consolidated Trial Practice Guide. The Parties agreed to modify the Default Protective Order to limit the categories of persons capable of accessing confidential information to outside counsel, experts, support personnel, and the Office.

Good cause exists for granting this Motion and entering the Proposed Modified Protective Order. The Board granted the Parties permission to file a Motion for a protective order during the December 8, 2023 teleconference. Further, the Parties submit that good cause exists because Petitioner intends to share confidential financial information with Patent Owner in response to Patent Owner’s discovery requests. Said disclosure is only possible under a limited protective order.

¹ A redline comparison of the Proposed Modified Protective Order to the Board’s Default Protective Order from the November 2019 Trial Practice Guide is attached hereto as Exhibit 1020.

For the above reasons, the Parties jointly and respectfully request the Board enter the Proposed Modified Protective Order attached hereto as Exhibit 1021.

Dated: January 3, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

Under 37 C.F.R. § 42.6(e), the undersigned certifies that on January 3, 2024, a copy of the foregoing JOINT MOTION FOR ENTRY OF MODIFIED PROTECTIVE ORDER, was served in its entirety on the following counsel of record for Patent Owner via email:

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