

From: [Stavinoha, Clarke](#)
To: [Trials](#)
Cc: [Williams, Eliot D.](#); [Burke, Katharine](#); [Knierim, Michael](#); [Thompson, Matthew](#); jason.engel.ptab@klgates.com; [Kantarek, Kyle M.](#); nolan.hubbard@klgates.com; [Lund, Jared R.](#)
Subject: IPR2023-01292: Authorization to File Motion to Extend Deadline to File Motion to Expunge
Date: Friday, April 11, 2025 4:22:13 PM

Your Honors,

Petitioner in the above-referenced proceeding respectfully requests authorization to file a motion to extend the deadline to file a motion to expunge.

Petitioner submitted confidential information during the trial, subject to a protective order. The Trial Practice Guide provides that confidential information subject to a protective order ordinarily would become public 45 days after final judgment in a trial, which is before the deadline for filing a notice of appeal. To preserve the record in the event of an appeal and protect Petitioner's confidential information, Petitioner respectfully requests authorization to file a motion to extend the deadline to file a motion to expunge as follows: (i) in the event a notice of appeal is filed, 45 days after the final disposition of any appeals or remand proceedings from any such appeal, or (ii) in the event no notice of appeal is filed, one week after the deadline to file a notice of appeal. The Board has previously found that it is reasonable to maintain the record undisturbed pending the outcome of any appeal that may be taken. *See Beckman Coulter, Inc. v. Sirigen II Limited*, IPR2022-01203, Paper 68 (P.T.A.B. Jan. 31, 2024).

Petitioner has met and conferred with counsel for Patent Owner, who indicated that Patent Owner does not oppose this request or the motion.

Respectfully,
Clarke Stavinoha (Reg. No. 71,152)
Counsel for Petitioner

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