Filed Jointly on Behalf of: Bazooka-Farmstar, LLC and Nuhn Industries LTD.

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BAZOOKA-FARMSTAR, LLC,

Petitioner,

- vs. -

NUHN INDUSTRIES LTD.,

Patent Owner.

JOINT MOTION TO SEAL AND FOR ENTRY OF STIPULATED PROTECTIVE ORDER

Case IPR2024-00098
U.S. Patent No. 11,541,708

Pursuant to Section A.2 of the Scheduling Order (Paper 11 at 2-3), the Parties jointly file this Joint Motion to Seal and Entry of Stipulated Proposed Protective Order (the "Stipulated PO"). *See* EX1070.

On August 14, 2024, Nuhn filed its initial Motion to Seal and for Entry of Protective Order (Paper 19), seeking to seal Exhibits 2055–2059, 2075–2078, and 2083, as well as its Patent Owner Response.

The Parties met and conferred on August 21, 2024 to discuss whether an agreement on a stipulated proposed protective order could be reached. The Parties were successful in negotiating the Stipulated PO. *See* EX1070.

The Stipulated PO is closely modeled on the Standing Protective Order in Appendix B of the Patent Trial and Appeal Board's Office Patent Trial Practice Guide, 77 Fed. Reg. 48756, 48756-66 (Aug. 14, 2012). The Standing Protective Order has been modified to (a) restrict each party's respective in-house counsel, directors, officers, and shareholders from seeing the subject confidential financial materials; (b) permit the use of confidential materials in related IPR Nos. IPR2023-01161 and IPR2024-00004, as well as the federal district court case *Nuhn Industries Ltd. v. Bazooka Farmstar, LLC*, Case No. 3:22-cv-00015 (S.D. Iowa); and (c) requires the parties to destroy or return confidential materials within sixty (60) calendar days.

The Stipulated PO has been submitted as Petitioner's EX1071, showing the proposed amendments to the Standard Protective Order in redline. A clean copy of the Stipulated PO has been submitted as Petitioner's EX1070.

For the foregoing reasons, the Parties respectfully request that the Board enter the Stipulated PO (EX1070).

Respectfully submitted,

Date: September 10, 2024

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CERTIFICATE OF SERVICE

The undersigned certifies, in accordance with 37 C.F.R. §§42.105 and 42.6, that service was made on the Patent Owner as detailed below.

Date of service	September 10, 2024
Manner of service	Electronic mail addressed to: bluchsinger@harnessip.com syackey@harnessip.com mcutler@harnessip.com
Documents served	JOINT MOTION TO SEAL AND FOR ENTRY OF STIPULATED PROTECTIVE ORDER
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