

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Askeladden L.L.C.,
Petitioner

v.

Calabrese Stemer LLC,
Patent Owner

Case: IPR2024-00368
Patent No. US 8,783,564 B2

Motion to Seal - 37 CFR § 42.14

Motion for Protective Order - 37 CFR § 42.54

Patent Owner's paper entitled "Affidavit" filed on January 24, 2025, which contained a "Declaration" by Patent Owner, should be sealed and its confidentiality should be protected with a specific protective order.

Patent Owner and Petitioner have conferred with regard to the enclosed proposed protective order and have agreed upon the enclosed protective order.

The concurrently submitted *Proposed Protective Order* is a modified version of the Default Protective Order set forth in Appendix B of the Patent Trial and Appeal Board’s Consolidated Trial Practice Guide. Changes to the Default Protective Order are marked by cross-out and underlining.

RELIEF REQUESTED

Patent Owner requests that the proposed protective order be entered and that the enclosed declaration (“Affidavit”) be sealed.

Respectfully submitted,

/Werner H. Stemer/

Werner H. Stemer
Calabrese Stemer LLC

February 4, 2025

CERTIFICATE OF SERVICE

The undersigned herewith certifies that a copy of the foregoing motion was served upon Petitioner's lead counsel concurrently with the filing thereof. The parties have agreed that a filing at the Board satisfies the service requirement.

/Werner H. Stemer/
Werner H. Stemer
Calabrese Stemer LLC

January 24, 2025