

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

Revised Motion to Seal

Patent Owner's Declaration filed concurrently herewith as an exhibit should be sealed. A public version of the declaration is also being filed as an exhibit.

The Declaration contains confidential information regarding licensing activities in the three patents that are subject to concurrent IPR proceedings. Each of the license contracts contains a confidentiality clause. The following text copies the most pertinent portions of such a confidentiality clause. All of the licenses define stringent limits on disclosure and all of the confidentiality clauses are identically or similarly worded:

Confidentiality. From and after the Effective Date, neither party shall disclose the terms of this Agreement except:

with the prior written consent of the other party;

to any governmental body having jurisdiction and specifically requiring such disclosure;

in response to a valid subpoena or as otherwise may be required by law or regulatory request, provided however, that reasonable efforts will be made to only make the production under a protective order or confidentiality agreement and pursuant to an "Outside Counsel Eyes Only" or higher confidentiality designation;

. . . .

as required during the course of litigation and subject to protective order; provided however, that reasonable efforts will be made to only make the production under a protective order and pursuant to an "Outside Counsel Eyes Only" or higher confidentiality designation; or

. . . .

RELIEF REQUESTED

Patent Owner requests that the enclosed declaration be sealed and that the proposed protective order be adopted.

Respectfully submitted,

/Werner H. Stemer/

Werner H. Stemer
Calabrese Stemer LLC

February 25, 2025