

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DR. REDDY'S LABORATORIES S.A. and
DR. REDDY'S LABORATORIES, INC.,

Petitioners,

v.

EYE THERAPIES, LLC,

Patent Owner.

Case IPR2024-00563
U.S. Patent No. 11,596,600

**PATENT OWNER'S MOTION TO SEAL AND
ENTRY OF STIPULATED PROPOSED PROTECTIVE ORDER**

I. Introduction

Patent Owner Eye Therapies, LLC (“Patent Owner”) requests that the confidential versions of Patent Owner’s Response; Exhibits 2046, 2103, 2104, and 2105, which are excerpts of regulatory documents related to the commercial product Lumify; and Exhibits 2063, 2069, 2070, 2072, 2074, 2075, 2077, 2078, 2132, 2135, and 2136, which contain sensitive commercial and financial information related to Bausch & Lomb (Patent Owner’s real-party-in interest), be sealed under 37 C.F.R. § 42.54. Good cause to seal these documents exists because public versions of Patent Owner’s Response and Exhibits 2063, 2069, 2070, 2072, 2074, 2075, 2077, 2078, 2132, 2135, and 2136 have also been filed, and the redacted information in these exhibits is sensitive, non-public commercial and financial information. Further, this motion addresses the *Argentum* factors, including how and why public disclosure of the information sought to be sealed would cause concrete harm to Patent Owner and Bausch & Lomb. Petitioners do not oppose the Motion to Seal and Entry of the Proposed Protective Order.

II. Governing Rules: The *Argentum* Factors

A party moving to seal a document must show “good cause” for the relief requested. 37 C.F.R. §§ 42.20(c), 42.54. The “good cause” standard “reflects the strong public policy for making all information in an inter partes review open to the

public.” *See Argentum Pharms. LLC v. Alcon Research, Ltd.*, IPR2017-01053, Paper 27 at 3 (PTAB Jan. 19, 2018) (informative). The moving party must show that:

- (1) the information sought to be sealed is truly confidential,
- (2) a concrete harm would result upon public disclosure,
- (3) there exists a genuine need to rely in the trial on the specific information sought to be sealed, and
- (4) on balance, an interest in maintaining confidentiality outweighs the strong public interest in having an open record.

Id. at 4.

III. Identification of Confidential Information

This motion refers to confidential information in two categories, both of which relate to sensitive, confidential information of Bausch & Lomb. Bausch & Lomb is the exclusive licensee of the '600 patent, the registered holder of the IND and NDA for the commercial product Lumify, and a real-party-in interest in this proceeding. The categories are summarized below:

- (1) *Non-public Bausch & Lomb regulatory documents and discussions thereof, reflecting Bausch & Lomb's confidential research and development.*

This information is contained in the following documents:

- Patent Owner's Response, page 51
- Exhibit 2223 (Declaration of Robert J. Noecker), ¶¶219-221, 243

- Exhibit 2226 (Declaration of Robert O. Williams, III, Ph.D.), page 22.
- Documentary Exhibits 2046, 2103, 2104, and 2105¹

(2) *Non-public discussion of Bausch & Lomb's sensitive commercial and financial information.* This information is contained in the following documents:

- Patent Owner's Response, pages 54-55 and 58-59
- Exhibit 2229 (Declaration of John C. Jarosz), ¶¶27 (including footnote 2), 60, 63, 68 (including footnote 5), 72-73, 75-83, 85, 89-90, 91 (including footnote 13), 93, 96, 98-100, 124-25, 134, 140-41 and Appendices 3-28
- Exhibit 2230 (Declaration of John Ferris), ¶¶4 (including footnote 1), 10, 14 (including footnote 3), 15-19, 22-27, 29, and 32-35

¹ In the related district court proceeding, Patent Owner designated these documents "COUNSEL'S EYES ONLY – SUBJECT TO DISCOVERY CONFIDENTIALITY ORDER." Patent Owner provided unstamped versions of the documents in this proceeding for legibility purposes.

- Documentary Exhibits 2063, 2069, 2070, 2072, 2074, 2075, 2077, 2078, 2132, 2135, and 2136²

IV. Good Cause Exists for Sealing the Confidential Information

Good cause exists for sealing all of the above, as all four *Argentum* factors are met. Each category of documents is addressed below.

A. Good Cause Exists for Sealing the Regulatory Documents and Discussions Thereof (Category 1)

First, there is no question that the Lumify regulatory documents (i.e., *Investigational New Drug* (IND) and *New Drug Application* (NDA) files, including Exhibits 2046, 2103, 2104, and 2105) are truly confidential. They were confidentially submitted to the FDA, and that confidentiality has been maintained since submission.

Second, concrete harm would result upon public disclosure. As background, Lumify is a patent-protected commercial product, which was approved in late 2018 and launched in 2019—about five years ago. Thus, although some of the referenced documents are seemingly a decade old, the reality is that they relate to the approval of a relatively new commercial product. Moreover, Bausch & Lomb has publicly

² In the related district court proceeding, Patent Owner designated these documents “COUNSEL’S EYES ONLY.” Patent Owner provided unstamped versions of the documents in this proceeding for legibility purposes.

announced that it has Lumify-related products in its pipeline that likely also implicate these same categories of documents. Additionally, at least two generic drug manufacturers have already filed *abbreviated new drug applications* (ANDAs) seeking approval for generic copies of Lumify—meaning that competitors *are* interested in this product and would improperly benefit from disclosure of Bausch & Lomb’s proprietary information, and thus harming Bausch & Lomb.

At a high level, the information Patent Owner seeks to seal contains confidential development and technical information, identifying, among other things, internal specifications, suppliers, etc. For ease, a summary of each exhibit, along with an example of the harm to Bausch & Lomb upon disclosure, is provided below. For all of the same reasons provided below, disclosure of the redacted portions of Patent Owner’s Response, EX-2223 (Noecker Declaration), and EX-2226 (Williams Declaration) would result in the same harm, as these documents discuss these exhibits.

Exhibit	Description	Summary of Harm
EX-2046 (2.3.P Drug Product)	This exhibit is an excerpt from the Lumify NDA containing, e.g., the full qualitative and quantitative composition of Lumify, including reference to quality standards.	Disclosure would put Bausch & Lomb at a competitive disadvantage as it would give competitors access to the entirety of the drug product formulation, allowing competitors to circumvent traditional R&D processes by using Bausch & Lomb’s proprietary information.

EX-2103, EX-2104, and EX-2105 (Clinical Study Reports)	These exhibits contain excerpts from the clinical study reports for three studies submitted in connection with the approval of the Lumify NDA.	Disclosure would put Bausch & Long at a competitive disadvantage as it would give competitors access to, e.g., information <i>not only</i> about the commercially approved dosage of Lumify, but also additional dosages (not currently commercialized). Moreover, the Clinical Study Reports provide detailed proprietary clinical protocols and procedures, disclosure of which would allow competitors to circumvent traditional R&D processes by using Bausch & Lomb's proprietary information.
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Third, there exists a genuine need to rely on the specific information sought to be sealed. Indeed, Patent Owner has relied on these documents in connection with its non-obviousness arguments. *See* Patent Owner's Response at 51.

Fourth, the interest in maintaining confidentiality outweighs the strong public interest of having an open record. *See Sandoz, Inc. v. EKR Therapeutics, LLC*, IPR2015-00005, Paper 21 (PTAB April 24, 2015) (granting motion to seal relating to ANDA documents). Indeed, if this confidential information is made public, Bausch & Lomb's competitors could exploit this confidential information and gain an unfair competitive advantage over Bausch & Lomb. Moreover, the public's interest in Bausch & Lomb's confidential regulatory information (i.e., specifics as

to formulation, development, and clinical trials) is minimal, particularly because the highly detailed information set forth in the materials sought to be sealed is not relevant to the patentability of the claims.

B. Good Cause Exists for Sealing the Sensitive Commercial Discussions (Category 2)

First, there is no question Bausch & Lomb's sensitive commercial information (including that discussed in Exhibits 2063, 2069, 2070, 2072, 2074, 2075, 2077, 2078, 2132, 2135, and 2136) is confidential. These materials discuss Bausch & Lomb's market analysis, business strategy, and financial information relating to Lumify—a commercial embodiment of the patented invention. Bausch & Lomb treats these materials as confidential in the ordinary course of business.

Second, concrete harm would result upon public disclosure. Simply put, details about Bausch & Lomb's sensitive business information, including competitive market analysis, business strategy, and other information that provides insight into the inter-workings of Bausch & Lomb's business, would be valuable to Bausch & Lomb's competitors and harmful to Bausch & Lomb if made public. Indeed, Bausch & Lomb exists in a highly competitive commercial landscape; thus, maintaining confidentiality of sensitive business information is highly important.

For ease, a summary of each exhibit, along with an example of the harm to Bausch & Lomb upon disclosure, is provided below. For all of the same reasons

provided below, disclosure of the redacted portions of Patent Owner's Response, EX-2230 (Ferris Declaration), and EX-2229 (Jarosz Declaration), would result in the same harm, as these documents discuss these exhibits.

Exhibit	Description	Summary of Harm
EX-2063, 2069, 2070, 2072, 2074, 2075, 2077, 2078, 2132, 2135, and 2136 (Financial and Business Information)	These exhibits contain confidential and sensitive business and financial information, including market analysis, business strategy, and financial information relating to Lumify.	Disclosure would put Bausch & Lomb at a competitive disadvantage as it would give competitors access to sensitive business information which are essential to the running of the business.

Third, there exists a genuine need to rely on the specific information sought to be sealed. Indeed, Patent Owner has relied on the information sought to be sealed in its Papers. *See* Patent Owner's Response at 54-55 and 58-59.

Fourth, the interest in maintaining confidentiality outweighs the strong public interest of having an open record. Indeed, good cause exists to seal because the information includes details about Bausch & Lomb's sensitive business information, including Bausch & Lomb's competitive market analysis and business strategy, and would be valuable to Bausch & Lomb's competitors and harmful to Bausch & Lomb if made public. Indeed, if this confidential information is made public, Bausch & Lomb's competitors could exploit this confidential information and gain an unfair competitive advantage over Bausch & Lomb.

III. PROPOSED PROTECTIVE ORDER

Pursuant to 37 C.F.R. § 42.54(a), the parties propose that the default Protective Order found in Appendix B of the Trial Practice Guidance be entered, with slight modifications, as shown in attached Appendix 1. Appendix 2 shows in strike-through and underlining the changes in the proposed stipulated Protective Order, as compared to the default Protective Order. Good cause exists to enter the proposed protective order for the following reasons.

First, the default protective order permits disclosure of materials designated thereunder to the parties and their in-house counsel. However, the parties agree to allow disclosure of materials designated under the protective order to (1) in-house counsel and (2) party representatives who have responsibility for overseeing the conduct of this proceeding or participate in decisions with respect to this proceeding, provided that such in-house counsel and in-house representatives have signed Stipulated Discovery Confidentiality Order in *In re Lumify*, Case No. 3:21-cv-16766-GC-RL, ECF No. 17. Accordingly, good cause exists to modify the default Protective Order to preclude disclosure of materials designated thereunder to the parties except for their in-house counsel and/or party representatives who have responsibility for overseeing the conduct of this proceeding or participate in decisions with respect to this proceeding, provided that such in-house counsel and in-house representatives

have signed Stipulated Discovery Confidentiality Order in *In re Lumify*, Case No. 3:21-cv-16766-GC-RL, ECF No. 17.

Second, the proposed Protective Order adds one provision (Paragraph 7). The parties agree that this provision is necessary to clarify how confidential information that may be received by the parties in this proceeding may be used.

IV. CERTIFICATION OF NON-PUBLICATION

The undersigned counsel certifies the information sought to be sealed by this Motion to Seal has not, to their knowledge, been published or otherwise made public. Patent Owner has made efforts to maintain the confidentiality of this information in a related district court proceeding. In that district court proceeding, certain of the information that the parties presently move to seal has been produced and designated “COUNSELS’ EYES ONLY – SUBJECT TO DISCOVERY CONFIDENTIALITY ORDER.” While the other information has not yet been produced, if it is produced in the district court proceeding, it will be produced “COUNSELS’ EYES ONLY – SUBJECT TO DISCOVERY CONFIDENTIALITY ORDER” pursuant to a Protective Order agreed upon by the Parties.

V. CONCLUSION

For the reasons set forth above, the parties respectfully request the Board grant Patent Owner’s Motion to Seal.

Respectfully submitted,

Dated: December 3, 2024

/Bryan C. Diner/

Bryan C. Diner, Reg. No. 32,409

Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **Patent Owner's Motion to Seal and Enter Stipulated Proposed Protective Order** was served on December 3, 2024, via email directed to counsel of record for the Petitioners at the following:

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Dated: December 3, 2024

By: /Geneva Eaddy/
Geneva Eaddy
Case Manager
Finnegan, Henderson, Farabow,
Garrett & Dunner, LLP

Appendix 1

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DR. REDDY'S LABORATORIES S.A. AND
DR. REDDY'S LABORATORIES, INC.,
Petitioner,

v.

EYE THERAPIES, LLC,
Patent Owner.

Case IPR2024-00564
Patent 11,596,600

[PROPOSED] PROTECTIVE ORDER

This protective order governs the treatment and filing of confidential information, including documents and testimony.

1. Confidential information shall be clearly marked “PROTECTIVE ORDER MATERIAL.”

2. Access to confidential information is limited to the following individuals who have executed the acknowledgment appended to this order:

(A) Party Representatives. Representatives of record for a party in the proceeding.

(B) Experts. Retained experts of a party in the proceeding who further certify in the Acknowledgement that they are not a competitor to any party, or a consultant for, or employed by, such a competitor with respect to the subject matter of the proceeding.

(C) In-house counsel and in-house representatives. In-house counsel of a party and in-house representatives who have responsibility for overseeing the conduct of this proceeding or participate in decisions with reference to this proceeding, provided that such in-house counsel and in-house representatives have signed Stipulated Discovery Confidentiality Order in *In re Lumify*, Case No. 3:21-cv-16766-GC-RL, ECF No. 17.

(D) Support Personnel. Administrative assistants, clerical staff, court reporters and other support personnel of the foregoing persons who are reasonably

necessary to assist those persons in the proceeding shall not be required to sign an Acknowledgement, but shall be informed of the terms and requirements of the Protective Order by the person they are supporting who receives confidential information.

(E) The Office. Employees and representatives of the United States Patent and Trademark Office who have a need for access to the confidential information shall have such access without the requirement to sign an Acknowledgement. Such employees and representatives shall include the Director, members of the Board and their clerical staff, other support personnel, court reporters, and other persons acting on behalf of the Office.

3. Employees (e.g., corporate officers), consultants, or other persons performing work for a party, other than those persons identified above in (d)(2)(A)–(E), shall be extended access to confidential information only upon agreement of the parties or by order of the Board upon a motion brought by the party seeking to disclose confidential information to that person and after signing the Acknowledgment. The party opposing disclosure to that person shall have the burden of proving that such person should be restricted from access to confidential information.

4. Persons receiving confidential information shall use reasonable efforts to maintain the confidentiality of the information, including:

(A) Maintaining such information in a secure location to which persons not authorized to receive the information shall not have access;

(B) Otherwise using reasonable efforts to maintain the confidentiality of the information, which efforts shall be no less rigorous than those the recipient uses to maintain the confidentiality of information not received from the disclosing party;

(C) Ensuring that support personnel of the recipient who have access to the confidential information understand and abide by the obligation to maintain the confidentiality of information received that is designated as confidential; and

(D) Limiting the copying of confidential information to a reasonable number of copies needed for conduct of the proceeding and maintaining a record of the locations of such copies.

5. Persons receiving confidential information shall use the following procedures to maintain the confidentiality of the information:

(A) Documents and Information Filed With the Board.

(i) A party may file documents or information with the Board along with a Motion to Seal. The Motion to Seal should provide a non-confidential description of the nature of the confidential information that is under seal, and set forth the reasons why the information is confidential and should not be made available to the

public. A party may challenge the confidentiality of the information by opposing the Motion to Seal. The documents or information shall remain under seal unless the Board determines that some or all of it does not qualify for confidential treatment.

(ii) Where confidentiality is alleged as to some but not all of the information submitted to the Board, the submitting party shall file confidential and non-confidential versions of its submission, together with a Motion to Seal the confidential version setting forth the reasons why the information redacted from the non-confidential version is confidential and should not be made available to the public. A party may challenge the confidentiality of the information by opposing the Motion to Seal. The non-confidential version of the submission shall clearly indicate the locations of information that has been redacted. The confidential version of the submission shall be filed under seal. The redacted information shall remain under seal unless the Board determines that some or all of the redacted information does not qualify for confidential treatment.

(B) Documents and Information Exchanged Among the Parties. Documents (including deposition transcripts) and other information designated as confidential that are disclosed to another party during discovery or other proceedings before the Board shall be clearly marked as “PROTECTIVE ORDER MATERIAL” and shall be produced in a manner that maintains its confidentiality.

6. Within 60 days after the final disposition of this action, including the exhaustion of all appeals and motions, each party receiving confidential information must return, or certify the destruction of, all copies of the confidential information to the producing party.

7. Confidential information shall be used by the individuals identified in 2(A) - 2(D) solely for the purposes of this proceeding, any IPR or district court proceeding involving the same parties and same patents pursuant to any protective order already entered in that proceeding, or any appeal therefrom. Confidential information shall not be used by the individuals identified in 2(A) - 2(D) for any other business, commercial, competitive, or personal purpose. Confidential information shall not be disclosed by the individuals identified in 2(A) - 2(D) to anyone other than those set forth in Paragraph 2, unless and until the restrictions herein are removed either by written agreement of the parties or by Order of the Board. It is, however, understood that a Party Representative may give advice and opinions to his or her client (i.e., the Petitioner, the Patent Owner, and/or any real party in interest to the Petitioner or the Patent Owner) solely relating to the above-captioned proceeding and any appeal therefrom based on his or her evaluation of confidential information, provided that such advice and opinions shall not reveal the content of such confidential information, except by prior written agreement of the parties or by

Order of the Board. Nothing in this Order precludes a producing party from using or disseminating its own confidential information.

UNITED STATES PATENT AND TRADEMARK OFFICE

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DR. REDDY'S LABORATORIES, INC.,
Petitioner,

v.

EYE THERAPIES, LLC,
Patent Owner.

Case IPR2024-00563
Patent 11,596,600

**ACKNOWLEDGEMENT FOR ACCESS
TO PROTECTIVE ORDER MATERIAL**

I _____, affirm that I have read the Protective Order; that I will abide by its terms; that I will use the confidential information only in connection with this proceeding or any IPR or district court proceeding involving the same parties and same patents pursuant to any protective order already entered in that proceeding and for no other purpose; that I will only allow access to support staff who are reasonably necessary to assist me in this proceeding; that prior to any disclosure to such support staff I informed or will inform them of the requirements of the Protective Order; that I am personally responsible for the requirements of the terms of the Protective Order and I agree to submit to the jurisdiction of the Office and the United States District Court for the Eastern District of Virginia for purposes of enforcing the terms of the Protective Order and providing remedies for its breach.

Dated:

By: _____

Appendix 2

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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DR. REDDY'S LABORATORIES, INC.,
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Case IPR2024-00564
Patent 11,596,600

[PROPOSED] PROTECTIVE ORDER

This protective order governs the treatment and filing of confidential information, including documents and testimony.

1. Confidential information shall be clearly marked “PROTECTIVE ORDER MATERIAL.”

2. Access to confidential information is limited to the following individuals who have executed the acknowledgment appended to this order:

~~(A) Parties. Persons who are owners of a patent involved in the proceeding and other persons who are named parties to the proceeding.~~

~~(AB) Party Representatives. Representatives of record for a party in the proceeding.~~

~~(BC) Experts. Retained experts of a party in the proceeding who further certify in the Acknowledgement that they are not a competitor to any party, or a consultant for, or employed by, such a competitor with respect to the subject matter of the proceeding.~~

~~(CD) In-house counsel and in-house representatives. In-house counsel of a party and in-house representatives who have responsibility for overseeing the conduct of this proceeding or participate in decisions with reference to this proceeding, provided that such in-house counsel and in-house representatives have signed Stipulated Discovery Confidentiality Order in *In re Lumify*, Case No. 3:21-cv-16766-GC-RL, ECF No. 17.~~

~~(DE)~~ Support Personnel. Administrative assistants, clerical staff, court reporters and other support personnel of the foregoing persons who are reasonably necessary to assist those persons in the proceeding shall not be required to sign an Acknowledgement, but shall be informed of the terms and requirements of the Protective Order by the person they are supporting who receives confidential information.

~~(EF)~~ The Office. Employees and representatives of the United States Patent and Trademark Office who have a need for access to the confidential information shall have such access without the requirement to sign an Acknowledgement. Such employees and representatives shall include the Director, members of the Board and their clerical staff, other support personnel, court reporters, and other persons acting on behalf of the Office.

3. Employees (e.g., corporate officers), consultants, or other persons performing work for a party, other than those persons identified above in (d)(2)(A)–(E), shall be extended access to confidential information only upon agreement of the parties or by order of the Board upon a motion brought by the party seeking to disclose confidential information to that person and after signing the Acknowledgment. The party opposing disclosure to that person shall have the burden of proving that such person should be restricted from access to confidential information.

4. Persons receiving confidential information shall use reasonable efforts to maintain the confidentiality of the information, including:

(A) Maintaining such information in a secure location to which persons not authorized to receive the information shall not have access;

(B) Otherwise using reasonable efforts to maintain the confidentiality of the information, which efforts shall be no less rigorous than those the recipient uses to maintain the confidentiality of information not received from the disclosing party;

(C) Ensuring that support personnel of the recipient who have access to the confidential information understand and abide by the obligation to maintain the confidentiality of information received that is designated as confidential; and

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of the nature of the confidential information that is under seal, and set forth the reasons why the information is confidential and should not be made available to the public. A party may challenge the confidentiality of the information by opposing the Motion to Seal. The documents or information shall remain under seal unless the Board determines that some or all of it does not qualify for confidential treatment.

(ii) Where confidentiality is alleged as to some but not all of the information submitted to the Board, the submitting party shall file confidential and non-confidential versions of its submission, together with a Motion to Seal the confidential version setting forth the reasons why the information redacted from the non-confidential version is confidential and should not be made available to the public. A party may challenge the confidentiality of the information by opposing the Motion to Seal. The non-confidential version of the submission shall clearly indicate the locations of information that has been redacted. The confidential version of the submission shall be filed under seal. The redacted information shall remain under seal unless the Board determines that some or all of the redacted information does not qualify for confidential treatment.

(B) Documents and Information Exchanged Among the Parties. Documents (including deposition transcripts) and other information designated as confidential that are disclosed to another party during discovery or other proceedings before the

Board shall be clearly marked as “PROTECTIVE ORDER MATERIAL” and shall be produced in a manner that maintains its confidentiality.

6. Within 60 days after the final disposition of this action, including the exhaustion of all appeals and motions, each party receiving confidential information must return, or certify the destruction of, all copies of the confidential information to the producing party.

7. Confidential information shall be used by the individuals identified in 2(A) - 2(D) solely for the purposes of this proceeding or any appeal therefrom. Confidential information shall not be used by the individuals identified in 2(A) - 2(D) for any other business, commercial, competitive, or personal purpose. Confidential information shall not be disclosed by the individuals identified in 2(A) - 2(D) to anyone other than those set forth in Paragraph 2, unless and until the restrictions herein are removed either by written agreement of the parties or by Order of the Board. It is, however, understood that a Party Representative may give advice and opinions to his or her client (i.e., the Petitioner, the Patent Owner, and/or any real party in interest to the Petitioner or the Patent Owner) solely relating to the above-captioned proceeding and any appeal therefrom based on his or her evaluation of confidential information, provided that such advice and opinions shall not reveal the content of such confidential information, except by prior written agreement of the parties or by Order of the Board. Nothing in this Order

precludes a producing party from using or disseminating its own confidential information.

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I _____, affirm that I have read the Protective Order; that I will abide by its terms; that I will use the confidential information only in connection with this proceeding or any IPR or district court proceeding involving the same parties and same patents pursuant to any protective order already entered in that proceeding and for no other purpose; that I will only allow access to support staff who are reasonably necessary to assist me in this proceeding; that prior to any disclosure to such support staff I informed or will inform them of the requirements of the Protective Order; that I am personally responsible for the requirements of the terms of the Protective Order and I agree to submit to the jurisdiction of the Office and the United States District Court for the Eastern District of Virginia for purposes of enforcing the terms of the Protective Order and providing remedies for its breach.

Dated:

By: _____