

From: [Trials](#)
To: [Zeilberger, Daniel](#); [Trials](#)
Cc: [PH-MSD-JHU-IPR](#); [Modi, Naveen](#); [Wexler, Bruce M.](#); [Ratliff, Preston K.](#); [mark.stewart@merck.com](#); [IPR52261-0005IP1@fr.com](#); [nstephens@fr.com](#); [gkim@fr.com](#); [meiklejohn@fr.com](#); [mchun@fr.com](#)
Subject: RE: IPR2024-00240
Date: Friday, October 4, 2024 9:35:27 AM
Attachments: [image001.png](#)

Counsel – The Board motion to seal and proposed protective order should be filed with the original, confidential versions of the documents. Redacted versions should be filed within 10 business days thereafter.

Best regards,
Eric W. Hawthorne
Supervisory Paralegal Specialist
Patent Trial and Appeal Board

From: Zeilberger, Daniel <danielzeilberger@paulhastings.com>
Sent: Wednesday, October 2, 2024 6:13 PM
To: Trials <Trials@USPTO.GOV>
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Subject: IPR2024-00240

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Your Honors,

Petitioner and Patent Owner jointly write regarding IPR2024-00240. In particular, the Parties have agreed to a protective order, and Patent Owner intends to file with its upcoming Patent Owner's Response documents that have been designated by Petitioner as Highly Confidential under the proposed protective order. For such documents that have been designated Highly Confidential by Petitioner, the Parties request authorization to follow the following procedure: (1) Patent Owner would file confidential versions of the documents under seal; (2) within two weeks of the date the confidential versions of the documents were filed, Patent Owner would file the redacted versions of the documents based on redactions provided by Petitioner, and on the same day Petitioner would file a motion to seal together with the proposed protective order.

If the Board would prefer that the Parties proceed in a different manner, the Parties request the Board's guidance as to the preferred procedure.

Respectfully,
Daniel Zeilberger
Counsel for Petitioner

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