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>
Cc: PH-MSD-JHU-IPR <PH-MSD-JHU-IPR@paulhastings.com>; Modi, Naveen <naveenmodi@paulhastings.com>; Wexler, Bruce M. <brucewexler@paulhastings.com>; Ratliff, Preston K. <prestonratliff@paulhastings.com>; mark.stewart@merck.com; IPR52261-0005IP1@fr.com; nstephens@fr.com; gkim@fr.com; meiklejohn@fr.com; mchun@fr.com
Subject: IPR2024-00240

CAUTION: This email has originated from a source outside of USPTO. **PLEASE CONSIDER THE SOURCE** before responding, clicking on links, or opening attachments.

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

PAUL HASTINGS

Daniel Zeilberger | **Of Counsel, Litigation Department**
Paul Hastings LLP | 2050 M Street NW, Washington, DC 20036 | Direct: +1.202.551.1993 | Main: +1.202.551.1700 | Fax: +1.202.551.0493 | danielzeilberger@paulhastings.com | www.paulhastings.com

****
This message is sent by a law firm and may contain information that is privileged or confidential. If you received this transmission in error, please notify the sender by reply e-mail and delete the message and any attachments. If you reply to this message, Paul Hastings may collect personal information including your name, business name and other contact details, and IP address. For more information about Paul Hastings' information collection, privacy and security principles please click HERE. If you have any questions, please contact Privacy@paulhastings.com.

JHU 2403
Merck Sharp v. Johns Hopkins
IPR2024-00650