

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD. AND
SAMSUNG ELECTRONICS AMERICA, INC.,
Petitioners,

v.

MAXELL, LTD.,
Patent Owner

Cases: IPR2024-00735

U.S. Patent No. 11,017,815

**JOINT MOTION FOR ENTRY OF DEFAULT PROTECTIVE ORDER
AND TO SEAL PURSUANT TO 37 C.F.R. § 42.54**

Mail Stop **Patent Board**
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

Pursuant to 37 C.F.R. § 42.54 and authorization granted by the Board in the Order dated September 10, 2025 (Paper 36), Patent Owner Maxell Ltd., (“Patent Owner”) and Petitioners Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (“Petitioners”) hereby jointly move pursuant to 37 C.F.R § 42.54 for entry of the Default Protective Order and authorization to file under seal anticipated filings using the Board’s standard protective order.

The parties anticipate that the supplemental information to be filed pursuant to 37 C.F.R. § 42.123(b) will include highly sensitive and confidential business information of Petitioners. This information has been submitted under seal in *Maxell, Ltd. v. Samsung Electronics Co. Ltd. and Samsung Electronics America, Inc.*, 5:23-cv-00092-RWS (E.D. Tex.). Submission of these materials pursuant to the Board’s standard protective order will be consistent with the integrity and efficient administration of the proceedings, and will not restrict access to confidential information for employees and representatives of the Patent and Trademark Office who have a need for access to confidential information.

Accordingly, good cause exists for entry of the Default Protective Order and authorization to file the anticipated supplemental information under seal pursuant to 37 C.F.R § 42.54.

Case IPR2024-00735
Patent No. 11,017,815
Updated Mandatory Notices

Dated: September 12, 2025

Respectfully submitted,

/Robert G Pluta Reg No 50970/
Counsel for Patent Owner

/James M Heintz Reg No 41828/
Counsel for Petitioners

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CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of September, 2025, a copy of the attached **JOINT MOTION FOR PROTECTIVE ORDER AND TO SEAL PURSUANT TO 37 C.F.R. § 42.54** was served by electronic mail to the attorneys of record, at the following addresses:

James Heintz
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With a courtesy copy by electronic mail to:

dla-samsung-maxell@us.dlapiper.com

Respectfully submitted,

Date: September 12, 2025

By: /Robert G Pluta Reg No 50970/
Robert G. Pluta (Reg. No. 50,970)