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

Inter Partes Review No.: IPR2024-00828
U.S. Patent No. 8,982,086 B2

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

Pursuant to 37 C.F.R. § 42.54 and authorization granted by the Board in the Order dated September 29, 2025 (Paper 44), Petitioners Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. ("Petitioners") and Patent Owner Maxell Ltd., ("Patent Owner") 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 the parties. 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. The Default Protective Order is being filed concurrently with this Motion.

October 8, 2025 Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that on October 8, 2025, a true and correct copy of the foregoing document was served by emailing a copy of same (by agreement) to the following attorneys for the Patent Owner:

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