UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AMAZON.COM, INC.,
AMAZON.COM SERVICES LLC,
AMAZON WEB SERVICES, INC., and
TWITCH INTERACTIVE, INC.
Petitioner

v.

NL GIKEN INC.
Patent Owner

Inter Partes Review No.: IPR2025-00050

PETITIONER'S MOTION TO SEAL AND FOR ENTRY OF DEFAULT PROTECTIVE ORDER

I. INTRODUCTION

Under 37 C.F.R. §§ 42.54-55 and 42.14, Amazon.com Inc., Amazon.com Services LLC, Amazon Web Services, Inc., and Twitch Interactive, Inc. (collectively, "Petitioner"), hereby moves to seal portions of Exhibit 1006 submitted with the Petition for Inter Partes Review on November 25, 2024. Good cause to seal these documents exists because they include highly confidential, competitively sensitive information of Petitioner, which Petitioner designated as "PROTECTIVE ORDER MATERIAL."

II. AUTHORIZATION FOR THIS MOTION

Prior Board authorization is not required for "motions where it is impractical for a party to seek prior Board authorization." Consolidated Trial Practice Guide (Nov. 20, 2019) (the "Consolidated Trial Practice Guide"), p. 37. "Motions where it is not practical to seek prior Board authorization include motions to seal. . . ." *Id.*

III. CERTIFICATE OF CONFERENCE

Under 37 C.F.R. § 42.54, Petitioner, through the undersigned, hereby certifies that it has conferred with Patent Owner through counsel on November 22, 2024 in good faith regarding this motion. Patent Owner does not oppose Petitioner's Motion to Seal and has agreed to entry of the Default Protective Order.

IV. GOOD CAUSE EXISTS FOR SEALING PART OF EXHIBIT 1006

The Board may issue protective orders for good cause to protect a party from disclosing confidential information. Consolidated Trial Practice Guide, pp. 19-20; 37 C.F.R. §§ 42.54-55. In deciding whether to grant a motion to seal, the Board must find "good cause," and must "strike a balance between the public's interest in maintaining a complete and understandable file history and the parties' interest in protecting truly sensitive information." *Garmin International, Inc. et al. v. Cuozzo Speed Technologies LLC*, IPR2012-00001, Paper 36 at 4 (P.T.A.B. April 5, 2013). "Confidential Information" is identified in a manner consistent with Fed. R. Civ. P. 26(c)(1)(G), "which provides for protective orders for trade secret or other confidential research, development, or commercial information." *Id.*

The standard for granting a motion to seal is "for good cause." 37 C.F.R. §§ 42.20(c), 42.54(a). Good cause for sealing material can be established by demonstrating that the balance of the following considerations favors sealing the material: whether (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. *Argentum Pharm. LLC v. Alcon Rsch., Ltd.*, IPR2017-01053, Paper 27 at 2–3 (PTAB Jan. 19, 2018) (informative); *see also*

Corning Optical Communications RF, LLC, v. PPC Broadband, Inc., IPR2014-00440, Paper 47 at 3 (PTAB Apr. 14, 2015).

Here, Exhibit 1006 contains confidential information. Specifically, Exhibit 1006 is a copy of infringement contentions served on Petitioner under a protective order in an ongoing District Court proceeding between the Petitioner and Patent Owner. *See* Petition §III(E) (citing *NL Giken Inc. v. Amazon.com, Inc.*, No. 1:24-cv-00028, (D. Del.). The contentions include confidential proprietary and Confidential Business Information (CBI) of Petitioner. Good cause exists because the balance of the *Argentum* factors favors sealing portions of Exhibit 1006. Addressing the Argentum factors in turn:

First, the information Petitioner seeks to seal is truly proprietary and confidential, has only been served between the parties under the District Court protective order, and has not been made publicly available by Petitioner. The Trial Practice Guide provides that "[t]he rules aim to strike a balance between the public's interest in maintaining a complete and understandable file history and the parties' interest in protecting truly sensitive information." PTAB Consolidated Trial Practice Guide at 19 (November 2019). Further, those rules "identify confidential information in a manner consistent with Federal Rule of Civil Procedure 26(c)(1)(G), which provides for protective orders for trade secret or other confidential research, development, or commercial information." *Id.* (citing

37 C.F.R. § 42.54). The information Petitioner seeks to protect has nothing to do with patentability, but rather involves Petitioner's accused product and how Petitioner's accused product allegedly infringes the claims of the '592 Patent. The document at issue includes proprietary and confidential business information relating to technical and other specifications of one of Petitioner's accused products in a parallel District Court proceeding.

Without an assurance that this information will be protected, Petitioner may be adversely affected by public disclosure of their commercial product details to the public and to Petitioner's competitors.

Second, Petitioner would suffer several instances of concrete harm from the public disclosure of the confidential information sought to be sealed. Disclosure of the confidential information would expose Petitioner's confidential information to scrutiny by third parties, and may jeopardize contractual arrangements between Petitioner and its customers. Additionally, the highly competitive nature of the information leads to concerns regarding

Third, the information that is sought to be sealed is entirely unrelated to the substantive patentability of the '592 Patent. Instead, the information that is sought to be sealed is pertinent only to the specific technical details of Petitioner's accused commercial product and alleged infringement of Petitioner's commercial product of the '592 Patent claims.

Fourth, on balance, an interest in maintaining confidentiality outweighs the strong public interest in having an open record. Petitioner respectfully submits that the "strong public interest" in having an open record should not outweigh a party's expectation that confidential information unrelated to patentability should be maintained as confidential. Rather, Petitioner respectfully submits that the "strong public interest" in having an open record has its basis in ensuring that all information related to patentability is available to the public consistent with the public notice function of the patent system, e.g., the reasons for upholding a patent's patentability during a post-grant proceeding should be available to the public. Thus, for example, if confidential information in an IPR related to commercial success of a claimed invention were relied upon to establish patentability of claims, such information should fairly be made available to the public consistent with the public interest, so that the public is aware of the reasons for patentability. But that is not the case here, where the confidential information is not related to the patentability of the '592 Patent, rather as evidence of Petitioner's understanding of Patent Owner's purported claim constructions. The public interest in such a procedural finding does not outweigh or otherwise support public disclosure of Petitioner's confidential information.

Additionally, Petitioner submits a redacted version of the EX1006, attached as Appendix A, in recognition of the fact that much of the information contained in

the infringement contentions is public, and the Board's preference to "redact sensitive information, where possible, rather than seeking to seal entire documents." PTAB Consolidated Trial Practice Guide at 21-22, 91-92, 111, 120 (November 2019). Appendix A redacts only business and technical confidential information relating to technical and other specifications of one of Petitioner's accused products (as described above) and does not redact all publicly available information. Doing so serves the public interest having access to public proceedings and information while balancing the publics minimal interest in having access to the confidential information in the document to be sealed.

V. MOTION FOR ENTRY OF THE DEFAULT PROTETIVE ORDER

Pursuant to 37 C.F.R. § 42.54, Petitioner certifies that it has conferred with Patent Owner through counsel on November 22, 20224, who has agreed to entry of the Default Protective Order. Petitioner respectfully requests entry of the Board's Default Protective Order as set forth in Appendix B (and attached here as Appendix B) of the Consolidated Trial Practice Guide.

VI. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the Board grant this Motion to Seal and enter the Default Protective Order.

Dated: November 25, 2024

Respectfully submitted,

/s/ Jennifer Librach Nall

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Attorney for Petitioner, Amazon.com, Inc., Amazon.com Services, Inc., and Twitch Interactive, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies pursuant to 37 C.F.R. §§42.6(e) and 42.105 that on November 25, 2024, a true and correct copy of the forgoing documents were served by emailing a copy of same (by agreement) to the following attorneys for Patent Owner:

James Morris - James.Morris@WolfGreenfield.com

A courtesy copy was sent to the below counsel via electronic mail:

WGS-NLGikenv.Amazon@WolfGreenfield.com

Date: November 25, 2024

Respectfully submitted,

/s/ Jennifer Librach Nall

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Attorney for Petitioner, Amazon.com, Inc., Amazon.com Services, Inc., and Twitch Interactive, Inc.

APPENDIX A

Exhibit B
NL Giken Initial Infringement Claim Chart for US 10,880,592 – Served on October 4, 2024
CONFIDENTIAL – ATTORNEYS' EYES ONLY

Claim Limitation	Exemplary Amazon Infringement
1[PRE]: A receiving apparatus configured to receive digital moving image contents from outside providers of the digital moving image contents, the outside providers including a first provider providing a digital moving image content in accordance with a program schedule table predetermined by the provider and a second provider providing the digital moving image content independently f[ro]m the program schedule table, the receiving apparatus comprising:	To the extent this preamble is limiting, the Amazon '592 Accused Products[1] each comprise a receiving apparatus configured to receive digital moving image contents from outside providers of the digital moving image contents, the outside providers including a first provider providing a digital moving image content in accordance with a program schedule table predetermined by the provider and a second provider providing the digital moving image content independently from the program schedule table. For example, Amazon '592 Accused Products that comply with the FCC DTV mandate (such as the accused Amazon Fire TV, Fire TV Stick, and Fire TV Box products) each includes a digital tuner to receive digital moving image content from a broadcaster (first provider).

[1] "Amazon '592 Accused Products" hereinafter refers to the Amazon devices identified as infringing U.S. Patent No. 10,880,592 in Plaintiff NL Giken Inc.'s First Amended Disclosure of the Accused Products served on October 4, 2024.

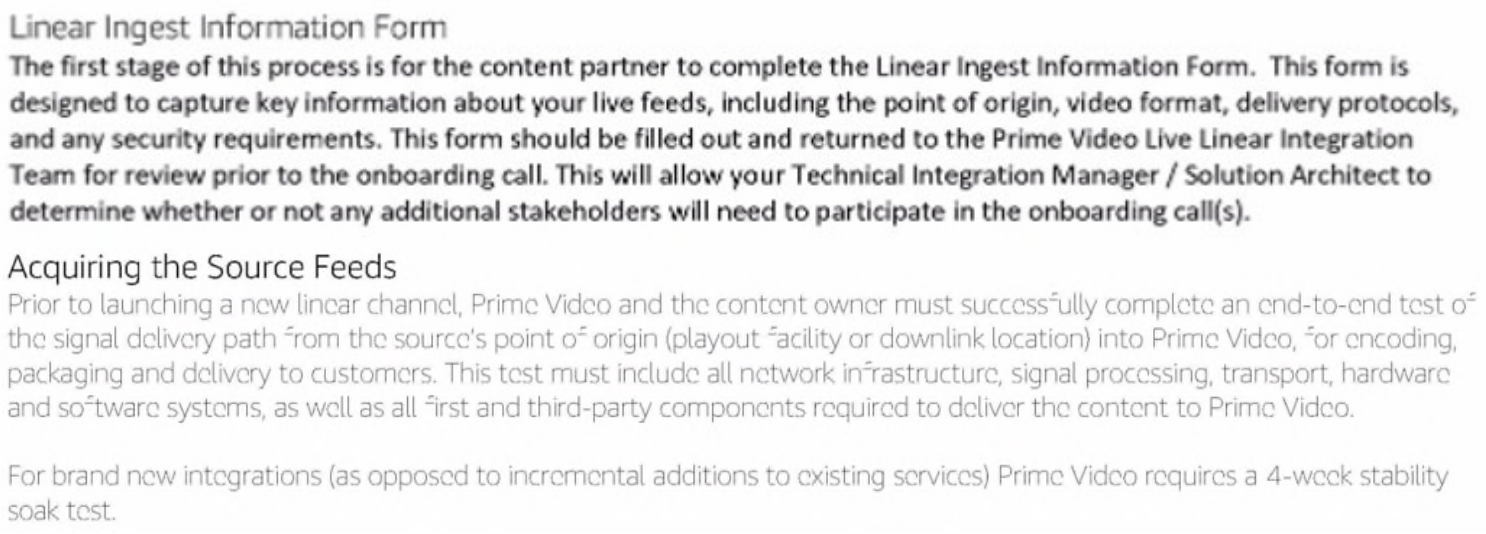
Claim Limitation	Exemplary Amazon Infringement



https://www.fcc.gov/reports-research/guides/dtv-enforcement

Claim Limitation	Exemplary Amazon Infringement
	Additionally, Amazon offers a service called Prime Video,[2] which can be accessed on each of the Amazon '592 Accused Products. Prime Video includes a service called "Live TV." Using Live TV, viewers receive digital moving image content (e.g., movies, concerts, sporting events) from outside providers (broadcasters) by using the Prime Video service as a tuner.  DEFS-NLG_0000577 Amazon obtains information from broadcasters whose live (*i.e.*, linear) content Amazon provides as "Live TV" and tests the reception of the "Live TV" from each broadcaster (e.g., playout facility):

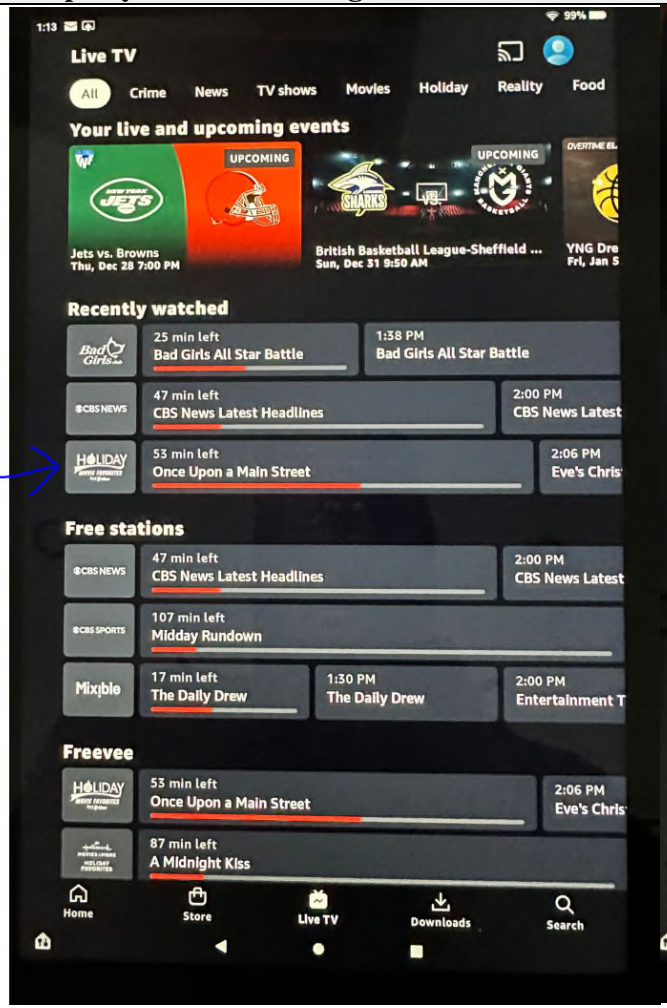
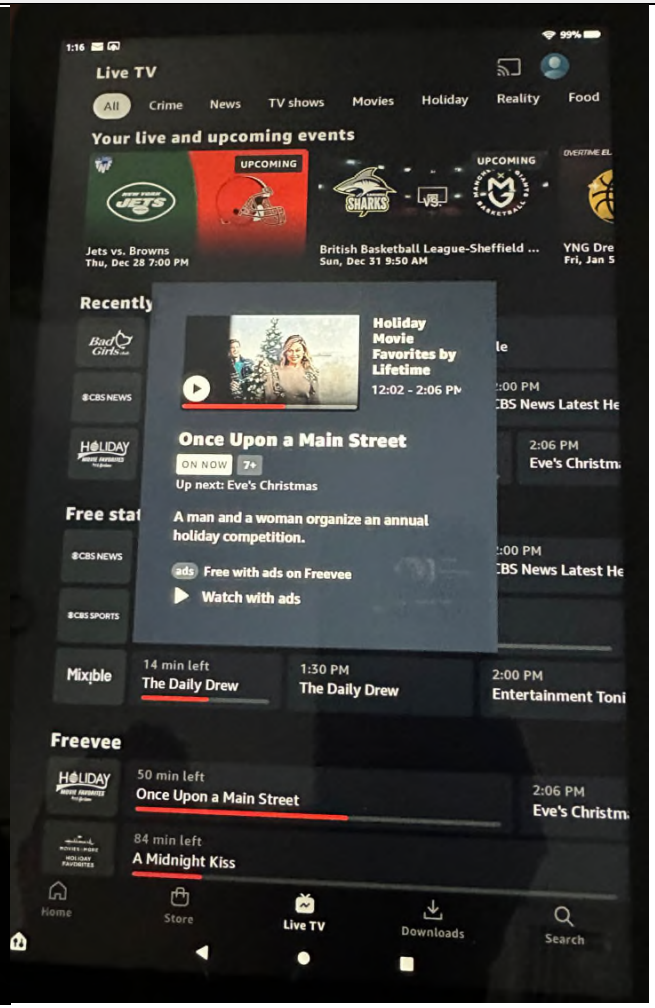
[2] The phrase "Prime Video" hereinafter refers to versions and apps of Amazon's Prime Video and Prime Video Life TV software as identified as infringing U.S. Patent No. 9,319,615 in NL Giken's First Amended Disclosure of the Accused Products served on October 4, 2024.

Claim Limitation	Exemplary Amazon Infringement
	 DEFS-NLG_0001366 Amazon provides the "Live TV" service according to a pre-set schedule that is predetermined by the provider. For example, the time corresponding to content being displayed (*e.g.*, Play Head) is set by the time corresponding to the recording of the piece of content (*e.g.*, Production edge), which is controlled by the broadcaster:

Claim Limitation	Exemplary Amazon Infringement
	 DEFS-NLG_0000574 at 0574-0575 Amazon provides the "Live TV" service including digital moving image content from a first provider (broadcaster) in accordance with a program schedule table.

Claim Limitation	Exemplary Amazon Infringement
	Amazon and/or a video on demand provider, as a second provider, offers many of the same moving image contents through Amazon's Prime Video service, independently from the Live TV program schedule table, that a user may choose to rent or buy from Amazon. For example, on December 26, 2023 at 1:13-1:16 pm, a movie called "Once Upon a Main Street" was available to watch on Amazon Live TV, through a first provider (broadcast channel). "Once Upon a Main Street" was also available to view through a second provider (Amazon), independent of the scheduled showing on Amazon Live TV.

Exhibit B
NL Giken Initial Infringement Claim Chart for US 10,880,592 – Served on October 4, 2024
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Claim Limitation	Exemplary Amazon Infringement
	

Claim Limitation	Exemplary Amazon Infringement
	 **Live TV on December 26, 2023 at 1:13-1:16 pm**

Exhibit B
NL Giken Initial Infringement Claim Chart for US 10,880,592 – Served on October 4, 2024
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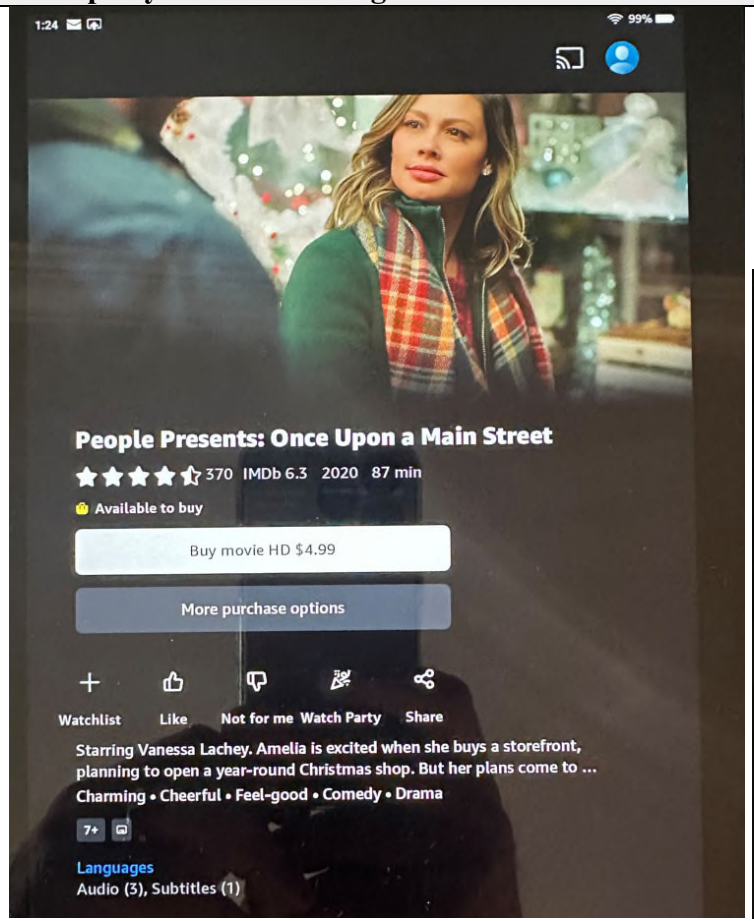
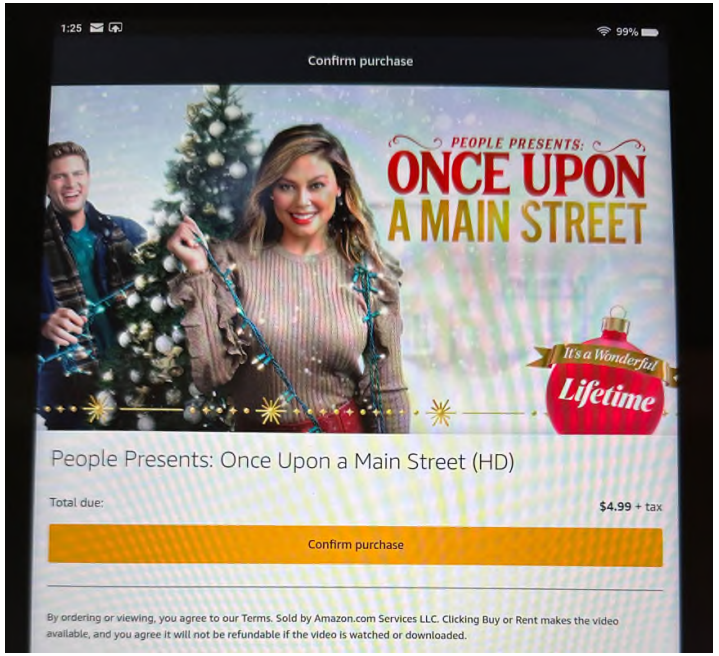
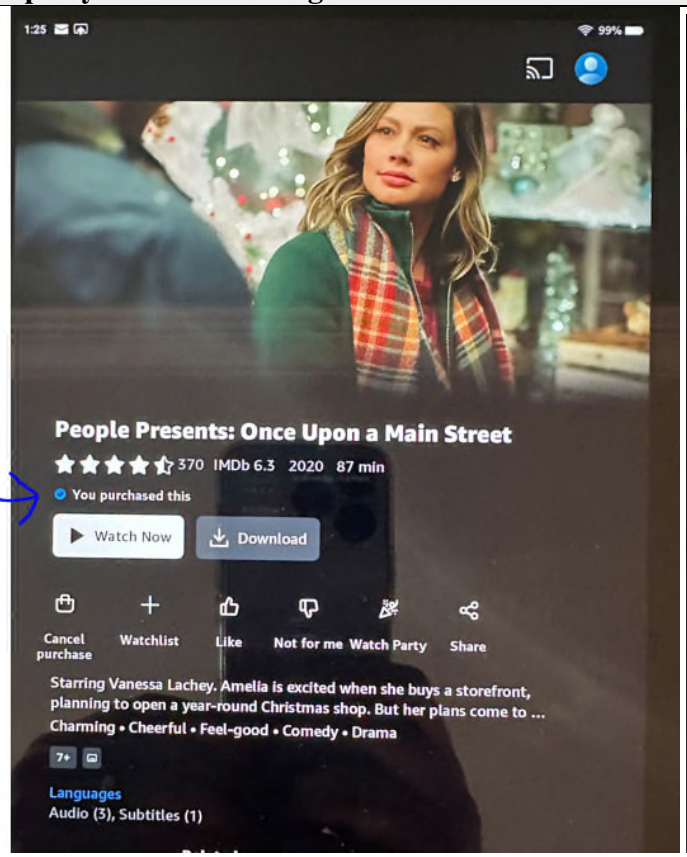
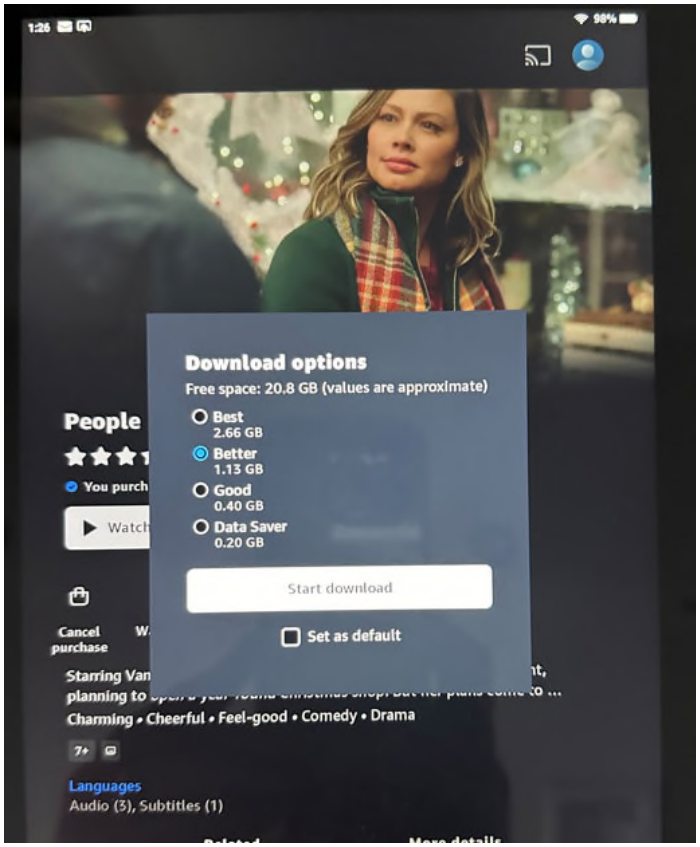
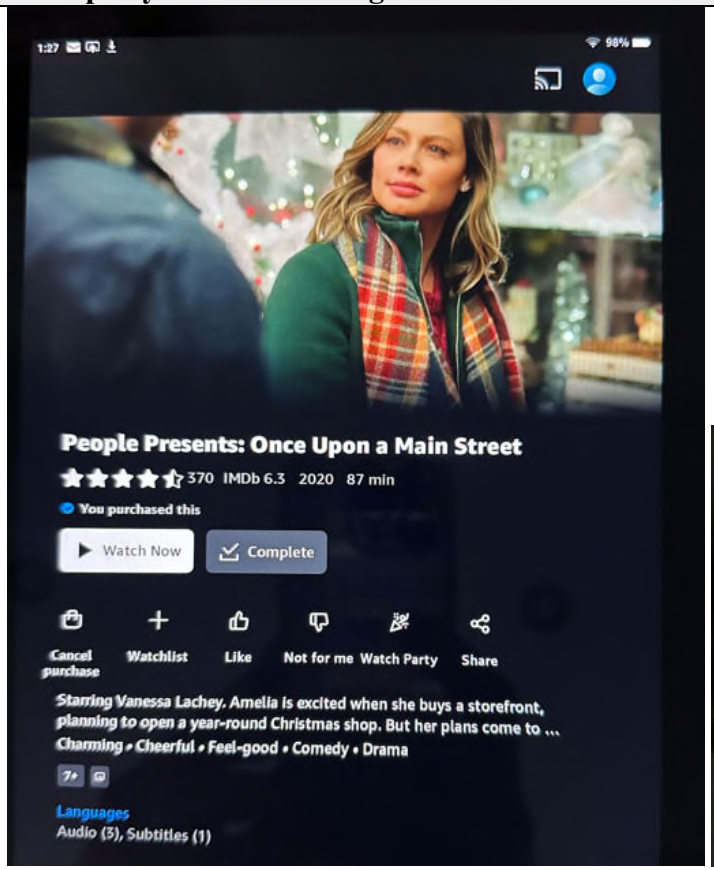
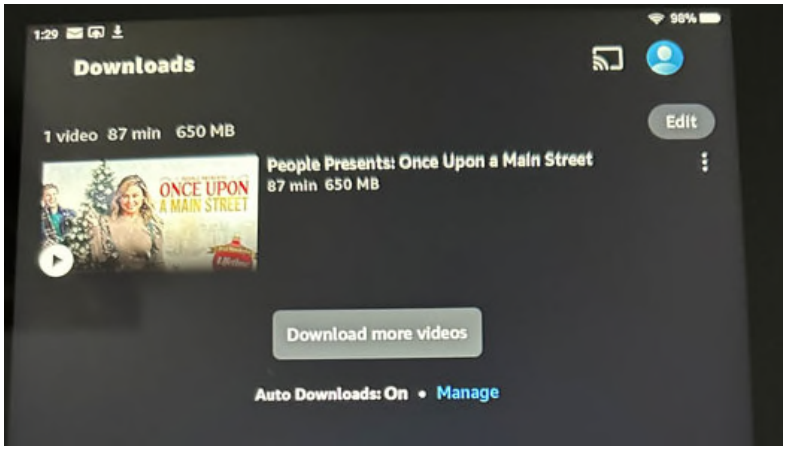
Claim Limitation	Exemplary Amazon Infringement
	 

Exhibit B
NL Giken Initial Infringement Claim Chart for US 10,880,592 – Served on October 4, 2024
CONFIDENTIAL – ATTORNEYS' EYES ONLY

Claim Limitation	Exemplary Amazon Infringement
	

Claim Limitation	Exemplary Amazon Infringement
	  **Once Upon a Main Street, available to buy and download from Amazon (December 26, 2023 at 1:24 pm)** Amazon also induces customers to download the Prime Video app onto third-party devices. Amazon additionally induces customers to stream content using Prime Video via a web browser on third-party devices. Such third-party devices with the Prime Video app installed and/or that stream Prime Video via a web browser include a receiving apparatus in the same way as described above.

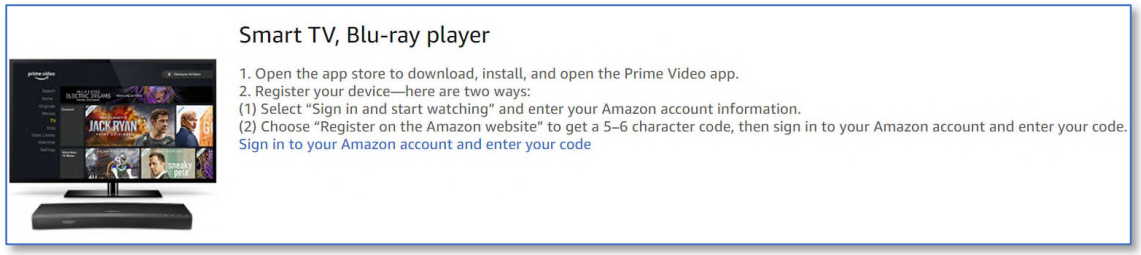
Claim Limitation	Exemplary Amazon Infringement
	  https://www.amazon.com/gp/video/splash/device_linking

Exhibit B
NL Giken Initial Infringement Claim Chart for US 10,880,592 – Served on October 4, 2024
CONFIDENTIAL – ATTORNEYS' EYES ONLY

Claim Limitation	Exemplary Amazon Infringement
[1A]: a remote controller that manually selects one of the digital moving image contents provided from the first provider, the selected digital moving image content being an integral program continuing from an opening part to an ending part by way of a midstream part;	The Amazon '592 Accused Products each include a remote controller that manually selects one of the digital moving image contents provided from the first provider, the selected digital moving image content being an integral program continuing from an opening part to an ending part by way of a midstream part. For example, some of the Amazon '592 Accused Products[3] include a remote controller that, when used with Prime Video with Live TV, can manually select one of the digital moving image contents provided from the first provider.

[3] *E.g.*, Amazon Fire TV (including the 2-Series, 4-Series, Omni Series, and Omni QLED Series); Fire TV Edition (including TVs provided by third-parties such as Panasonic, Insignia, TCL, Hisense, and Toshiba with the Fire TV interface embedded); Fire TV (box) (first generation); Fire TV (box) (second generation); Fire TV (box) (third generation); Fire TV (pendant); Fire TV Cube (first generation); Fire TV Cube (second generation); Fire TV Cube (third generation); Fire TV Stick (first generation); Fire TV Stick (second generation); Fire TV Stick (third generation); Fire TV Stick 4K (first generation); Fire TV Stick 4K Max; Echo Show (first generation); Echo Show (second generation); Echo Show 5 (first generation); Echo Show 5 (second generation); Echo Show 5 (third generation); Echo Show 8 (first generation); Echo Show 8 (second generation); Echo Show 8 (third generation); Echo Show 10; and Echo Show 15

Claim Limitation	Exemplary Amazon Infringement



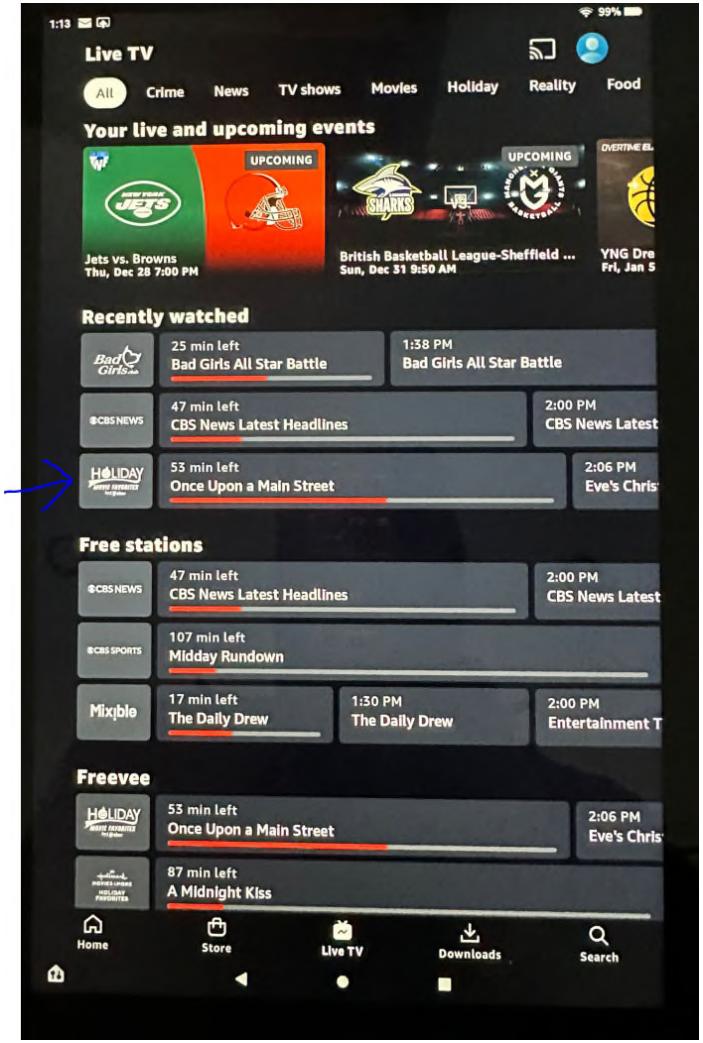
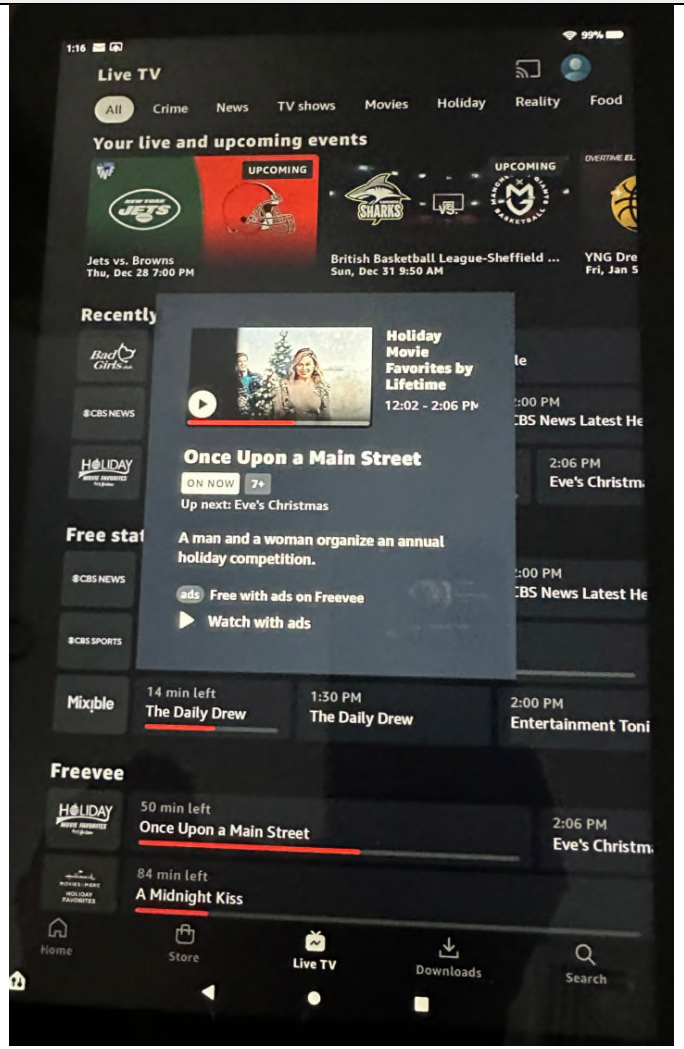
https://www.amazon.com/b?ie=UTF8&node=8521791011

As another example, others of the Amazon '592 Accused Products,[4] include a built-in Bluetooth receiver to support Bluetooth LE accessories, such as a Fire TV remote, Bluetooth mouse or Bluetooth keyboard, which are remote controllers that can control each of these Amazon '592 Accused Products.

Additional features	External volume controls, built-in Bluetooth with support for A2DP compatible stereo headphones, speakers, microphone, and LE accessories support

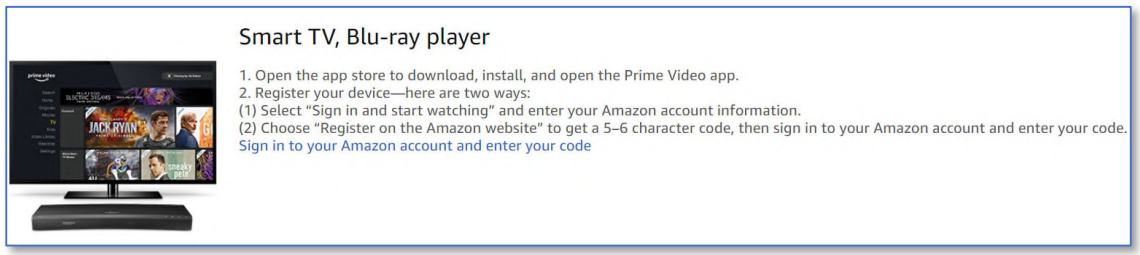
[4] *E.g.*, Fire tablets (fourth through thirteenth generation, all sizes)

Claim Limitation	Exemplary Amazon Infringement
	https://www.amazon.com/Fire-Tablet-7/dp/B07FKR6KXF?th=1 The selected digital moving image content is an integral program continuing from an opening part to an ending part by way of a midstream part.

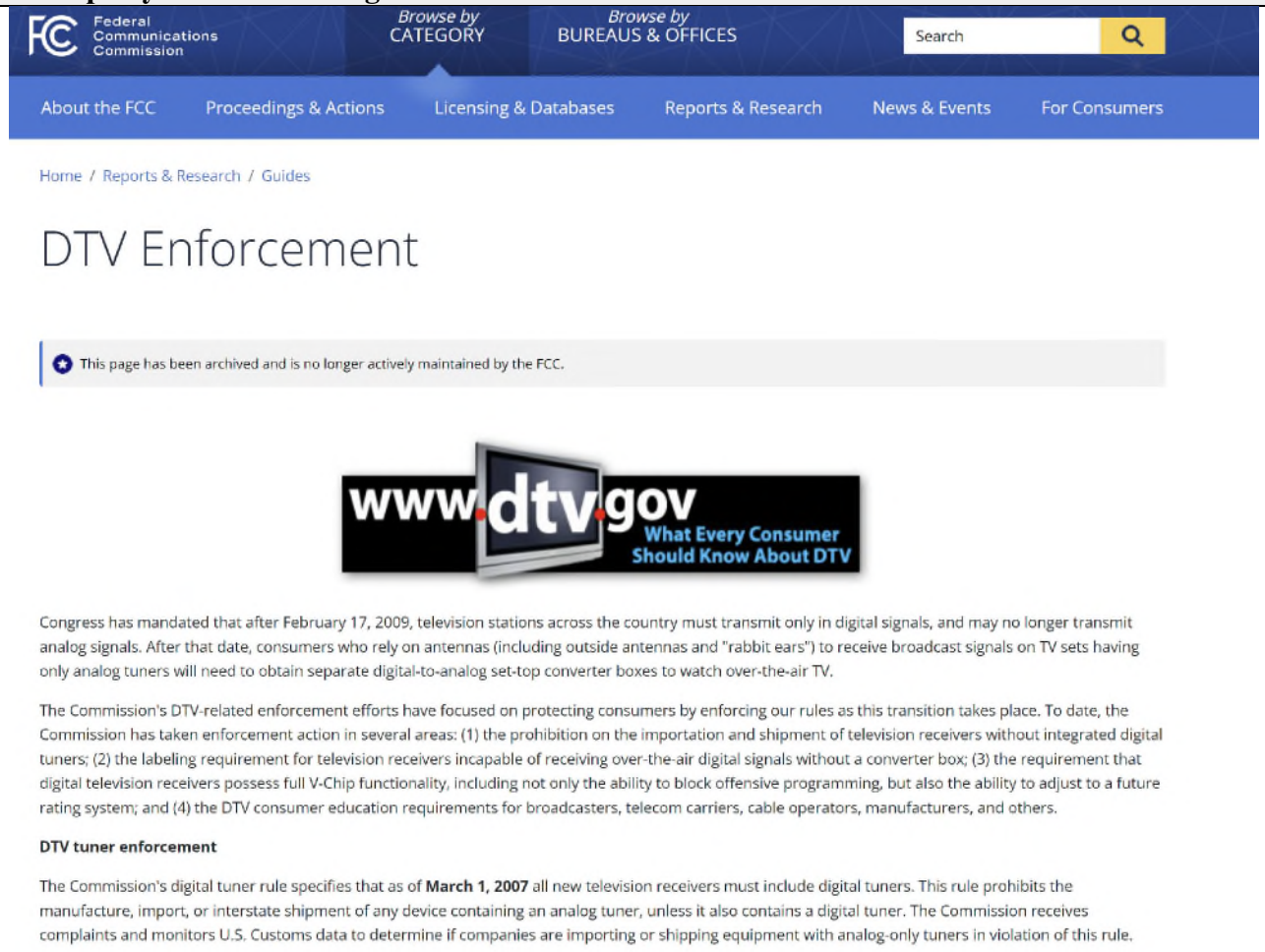
Claim Limitation	Exemplary Amazon Infringement
	 

Claim Limitation	Exemplary Amazon Infringement
	 **Live TV on December 26, 2023 at 1:13-1:16 pm** Thus, the Amazon '592 Accused Products include a remote controller capable of selecting a movie to watch on Prime Video with Live TV. For example, a remote control can be used to select digital moving image contents such as "Once Upon a Main Street," which is an integral program continuing from an opening part to an ending part by way of a midstream part. *See* limitation [1PRE] above.

Claim Limitation	Exemplary Amazon Infringement
	As another example, Amazon induces customers to pair the '592 Accused Products with third-party remotes, such as a user's mobile device running the Fire TV App. In such cases, the user's mobile device is a remote controller in the same way as explained above. Digital Services and Device Support › Fire TV Support › Fire TV Remotes › **Use Your Mobile Device Like a Fire TV Remote** Use your mobile device as a remote and never worry about where the controller went again. To control your Fire TV with your mobile phone: 1. Download the Fire TV app on your mobile device. This app is available in both the Apple App Store and Google Play Store. a. Apple App Store b. Google Play Store 2. Connect your mobile device to the same Wi-Fi network as your Fire TV Device. 3. Open the Fire TV app on your mobile device. 4. Select an available device on the screen. 5. Follow the on-screen prompt. 6. Use the on-screen navigation, keyboard, and other menu options to control the selected Fire TV device. For more help, try our Amazon Fire TV forum. Was this information helpful? Yes No https://www.amazon.com/gp/help/customer/display.html?nodeId=GGKS6F6YNYGHK6YG

Claim Limitation	Exemplary Amazon Infringement
	Amazon also induces customers to download the Prime Video app onto third-party devices. Amazon additionally induces customers to stream content using Prime Video via a web browser on third-party devices. These third-party devices (with the Prime Video app installed and/or that stream Prime Video via a web browser) include remote controllers such as TV remotes, Bluetooth mice, and/or Bluetooth keyboards and can be used to select digital moving image contents on the Prime Video app. Thus, such third-party devices with the Prime Video app installed and/or that stream Prime Video include a remote controller in the same way as described above.   https://www.amazon.com/gp/video/splash/device_linking
[1B]: a tuner that receives the selected digital moving image content at the midstream part of the integral program which is provided by the first provider at the time of selection by the remote controller;	The Amazon '592 Accused Products each include a tuner that receives the selected digital moving image content at the midstream part of the integral program which is provided by the first provider at the time of selection by the remote controller. For example, Amazon '592 Accused Products that comply with the FCC DTV mandate (such as the accused Amazon Fire TV, Fire TV Stick, and Fire TV Box products), each includes a digital tuner to receive digital moving image content from a broadcaster (first provider).

Claim Limitation	Exemplary Amazon Infringement



https://www.fcc.gov/reports-research/guides/dtv-enforcement

Additionally, each Amazon '592 Accused Products uses a tuner that receives (via Prime Video with Live TV) the selected digital moving image content at the midstream part of the integral program which is provided by the first

Claim Limitation	Exemplary Amazon Infringement
	provider at the time of selection by the remote controller. The Play Head is dictated by the Live edge and cannot be altered by the viewer:  DEFS-NLG_0000574 at 0574-0575

Claim Limitation	Exemplary Amazon Infringement
	Live content is passed through to the content delivery network (CDN) rather than being stored and provided as a complete content package. The Live Signal Acquisition requires a tuner to receive the live video for encoding and packaging:  DEFS-NLG_0000577 Live content is linear (i.e., viewer sees what is broadcast at the time of selection, such as "midstream part" but cannot go back to a previous portion of the program) and a Linear Ingest Guide provides information about linear (live) feeds:

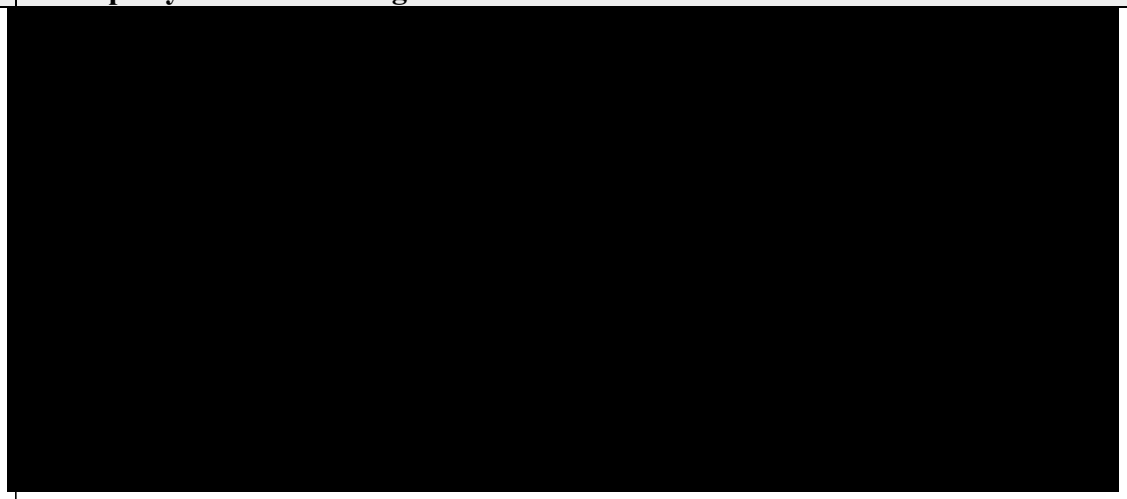
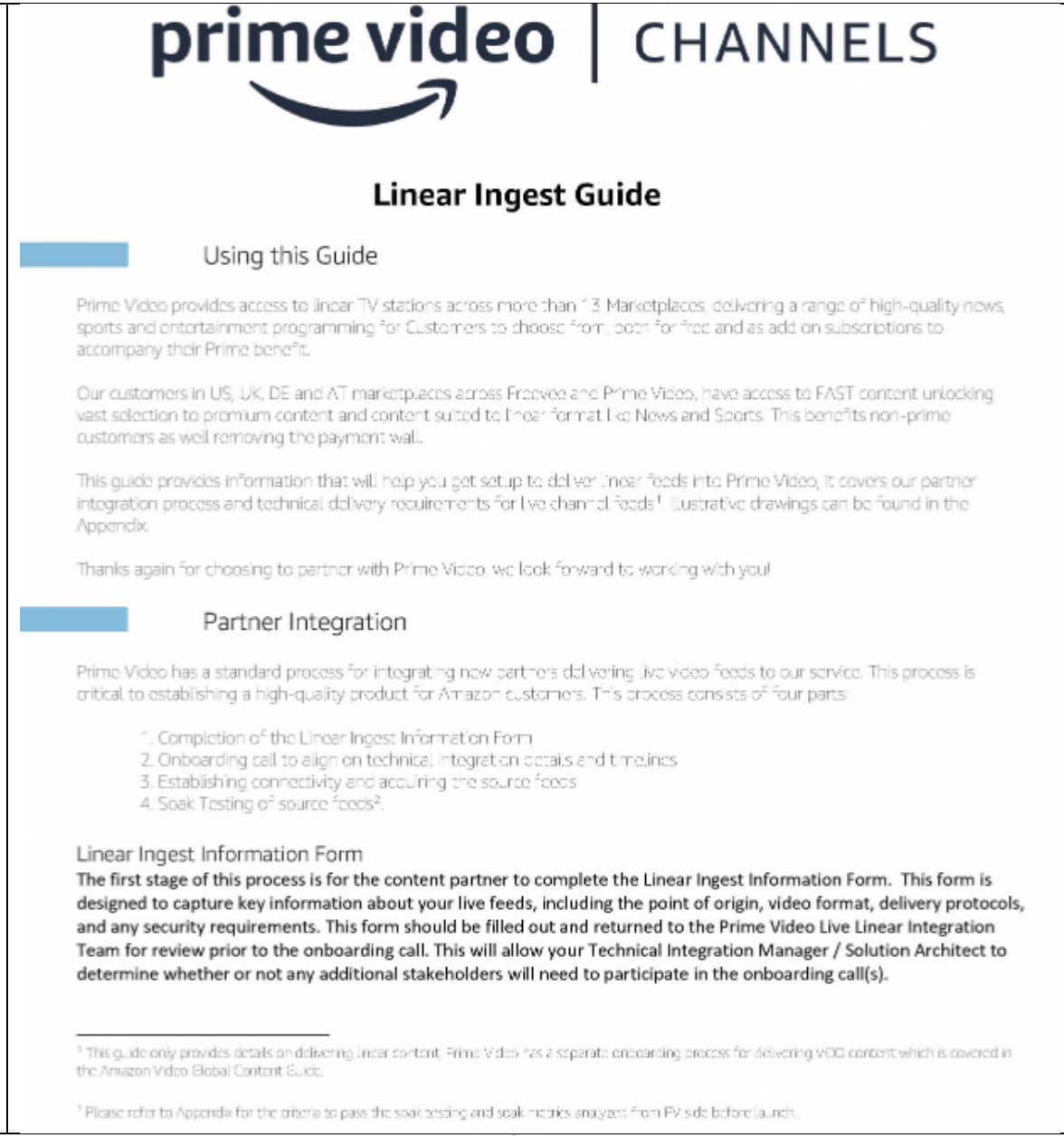
Claim Limitation	Exemplary Amazon Infringement
	
	. . .

Exhibit B
NL Giken Initial Infringement Claim Chart for US 10,880,592 – Served on October 4, 2024
CONFIDENTIAL – ATTORNEYS' EYES ONLY

Claim Limitation	Exemplary Amazon Infringement
	[redacted]

Amazon.com, Inc. - Exhibit 1006 - Page 24

Claim Limitation	Exemplary Amazon Infringement
	
	DEFS-NLG_0001302



prime video | CHANNELS

Linear Ingest Guide

Using this Guide

Prime Video provides access to linear TV stations across more than 13 Marketplaces, delivering a range of high-quality news, sports and entertainment programming for Customers to choose from, both for free and as add on subscriptions to accompany their Prime benefit.

Our customers in US, UK, DE and AT marketplaces across Freevee and Prime Video, have access to FAST content unlocking vast selection to premium content and content suited to linear format like News and Sports. This benefits non-prime customers as well removing the payment wall.

This guide provides information that will help you get setup to deliver linear feeds into Prime Video, it covers our partner integration process and technical delivery requirements for live channel feeds[1]. Illustrative drawings can be found in the Appendix.

Thanks again for choosing to partner with Prime Video, we look forward to working with you!

Partner Integration

Prime Video has a standard process for integrating new partners delivering live video feeds to our service. This process is critical to establishing a high-quality product for Amazon customers. This process consists of four parts:

1. Completion of the Linear Ingest Information Form
2. Onboarding call to align on technical integration details and timelines
3. Establishing connectivity and acquiring the source feeds
4. Soak Testing of source feeds[2].

Linear Ingest Information Form

The first stage of this process is for the content partner to complete the Linear Ingest Information Form. This form is designed to capture key information about your live feeds, including the point of origin, video format, delivery protocols, and any security requirements. This form should be filled out and returned to the Prime Video Live Linear Integration Team for review prior to the onboarding call. This will allow your Technical Integration Manager / Solution Architect to determine whether or not any additional stakeholders will need to participate in the onboarding call(s).

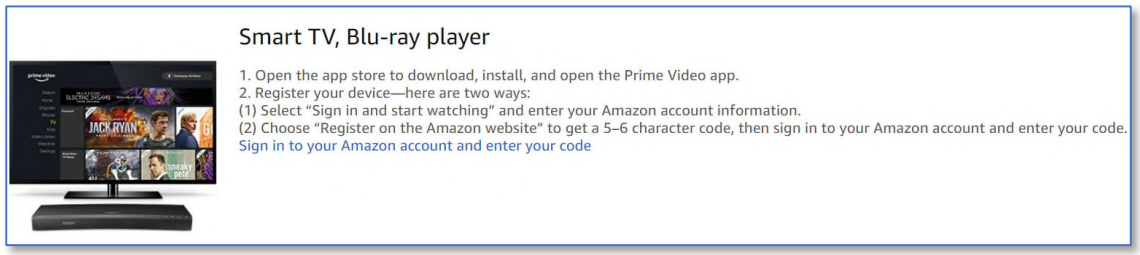
[1] This guide only provides details on delivering linear content. Prime Video has a separate onboarding process for delivering VOD content which is covered in the Amazon Video Global Content Guide.

[2] Please refer to Appendix for the criteria to pass the soak testing and soak metrics analyzed from PV side before launch.

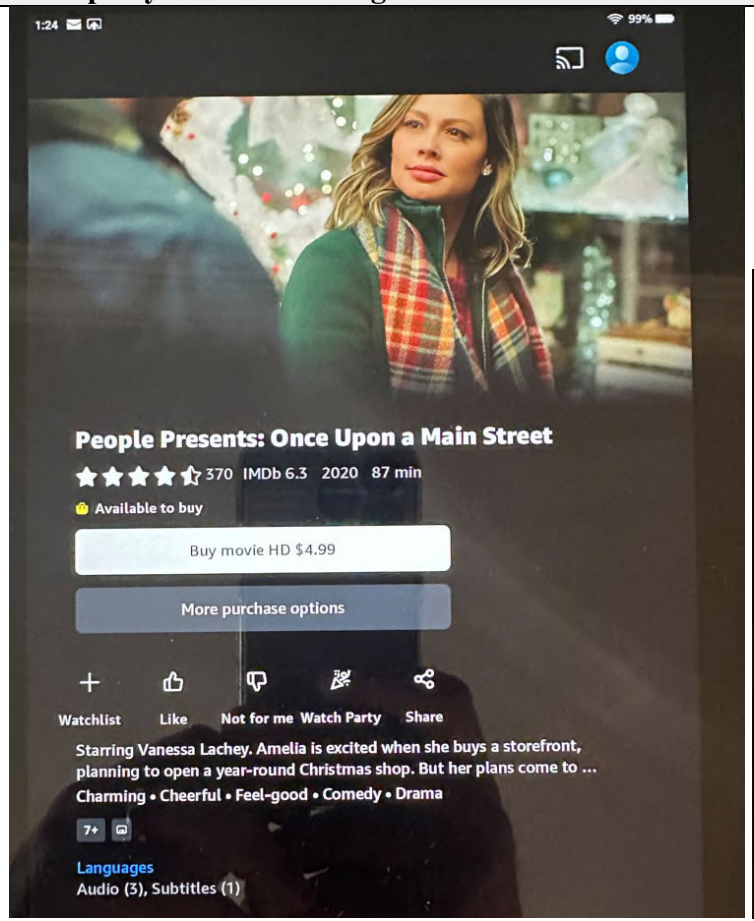
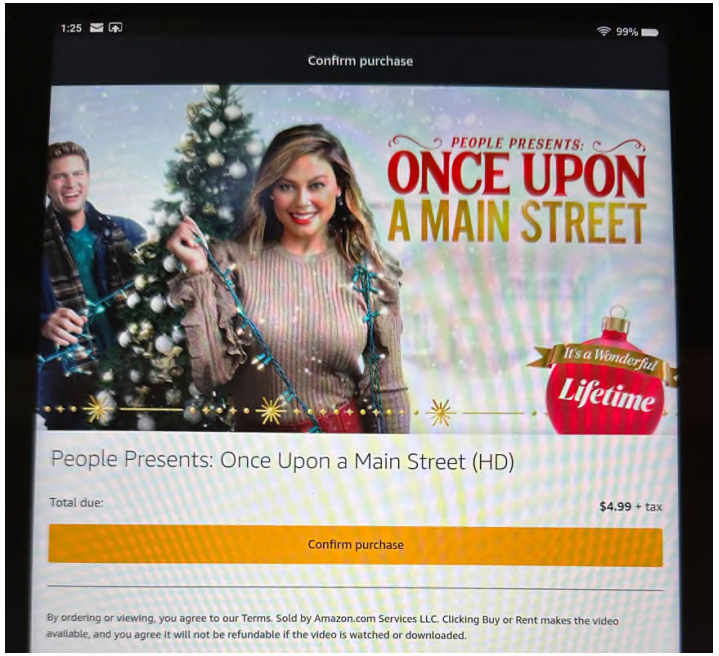
Claim Limitation	Exemplary Amazon Infringement
	Prime Video Linear Channel Ingest Guide 2024v1.0 contact: dv-linear-integration@amazon.com Onboarding Call Once the Linear Ingest Information Form has been completed and reviewed, your primary point of contact for signal on-boarding will be an assigned Technical Integration Manager or Solution Architect. Prime Video encourages content partners to be prepared with any questions they may have regarding the delivery of live feeds. In order to make the process more efficient, all relevant transport or delivery partners must have representation from their technical operations team present on the call. Acquiring the Source Feeds Prior to launching a new linear channel, Prime Video and the content owner must successfully complete an end-to-end test of the signal delivery path from the source's point of origin (playout facility or downlink location) into Prime Video, for encoding, packaging and delivery to customers. This test must include all network infrastructure, signal processing, transport, hardware and software systems, as well as all first and third-party components required to deliver the content to Prime Video. For brand new integrations (as opposed to incremental additions to existing services) Prime Video requires a 4-week stability soak test.

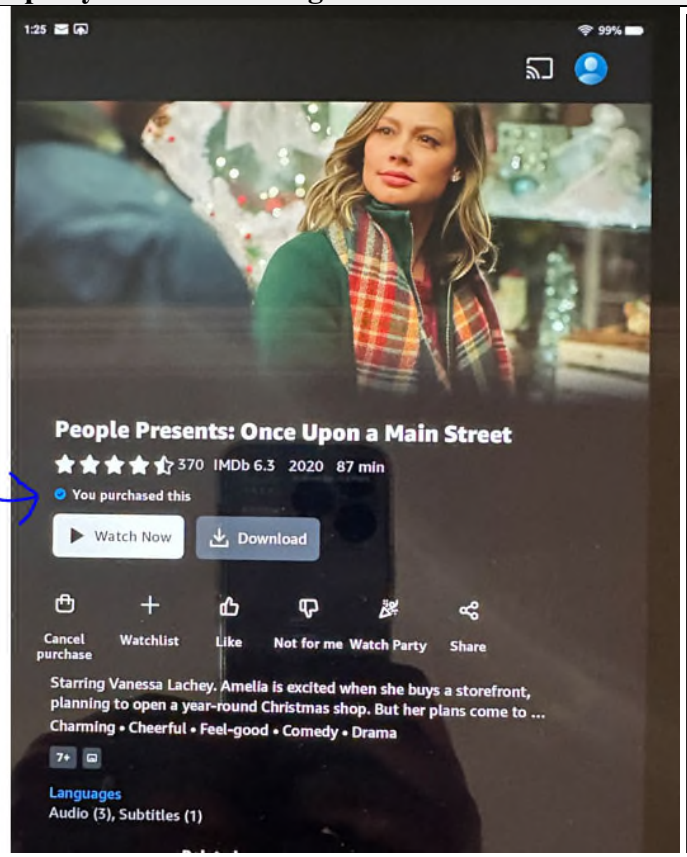
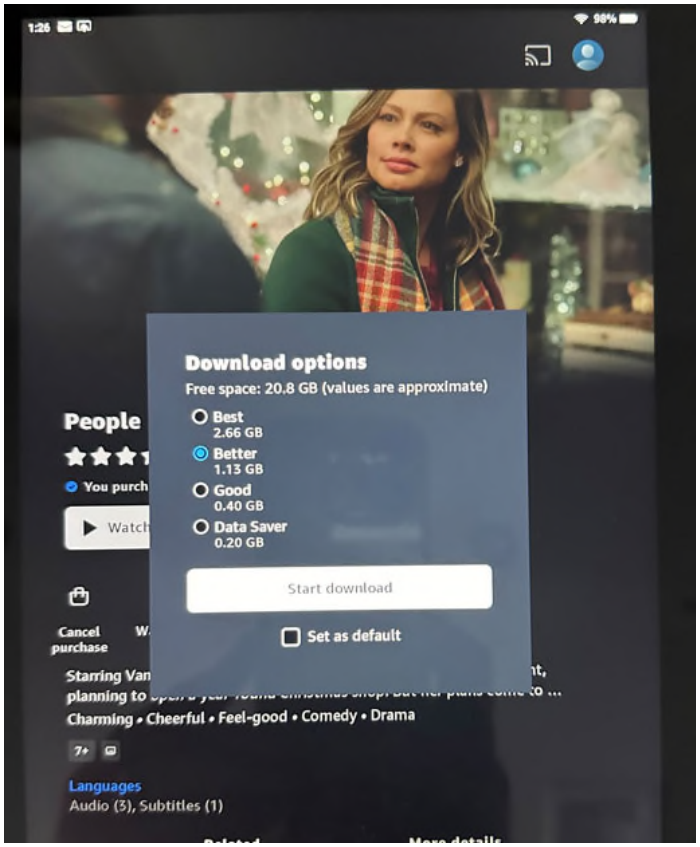
Claim Limitation	Exemplary Amazon Infringement
	Delivery of Live Feeds to Amazon Video Signal Flow Overview Prime Video operates its cloud video processing services within AWS, in multiple global regions; choosing the most appropriate one to use based on proximity to both our Content Partners and Customers. PV has a 99.9993% uptime target for both our internal systems, and partners on whom Customers depend. To achieve these targets, we require partners to deliver multiple redundant feeds of each station, which we process across multiple redundant services within different AWS Regions and Availability Zones. Without this high level of redundancy, we risk poor performance for customers and a high operational burden for both PV and partner teams. Prime Video receives, processes and delivers all redundant feed and considers all to be active, as opposed to primary and backup. Prime Video provides several options for partners to deliver their channel content feed (s) to our delivery endpoints. Broadly, these options are: 1. Cloud sourced delivery from either a playout server, or another cloud-based video processing service 2. On-Premise sourced delivery from the content partner's playout location or 3rd party location via AWS Direct Connect or other agreed networking solution Under either option PV prefers partners contribute video using the Zixi protocol which provides a high level of protection against network impairments. Once signal delivery is established, any changes to that workflow need to be communicated to the Prime Video Integration Manager with at least 90 days advance notice; any change in delivery cost will be the responsibility of the content owner.

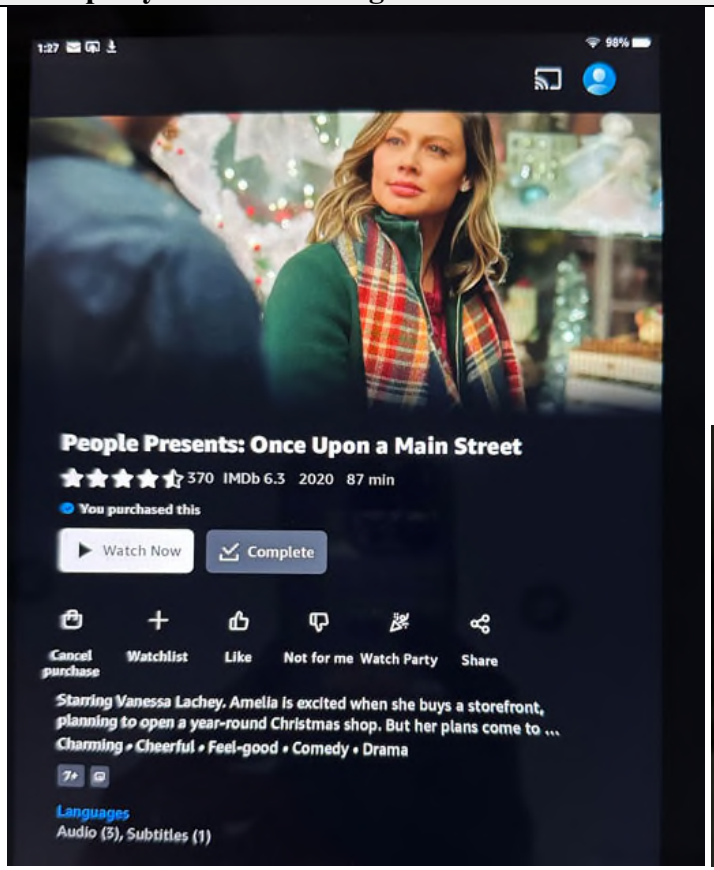
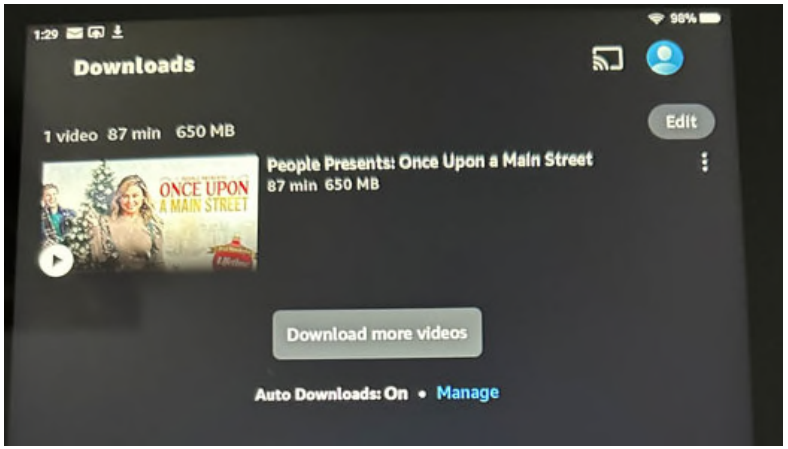
Claim Limitation	Exemplary Amazon Infringement
	Drawings can be found in the Appendix. Cloud Sourced Delivery Prime Video works with a range of partners who operate 1st or 3rd party playout and video processing systems in the cloud. Contribution of linear services from these partners must use the Zixi protocol in order to ensure the feeds are delivered reliably, this can be achieved by either 1) the playout system supporting Zixi protocol 2) the partner supporting Zixi feeder or Zixi Broadcaster within their cloud infrastructure or 3) the partner using Elemental MediaConnect and sharing the signal with Prime Video with Zixi feeds. Sources must come from redundant infrastructure hosted in different AWS Regions or Availability Zones. [3] Equating to less than 26s unplanned downtime per station per month On-Premise Sourced Delivery Prime Video can receive signals directly from the partner playout facility or from several signal acquisition partners (Encompass Digital Media, Softbank, SES and Telstra); we have established Direct Connections into AWS from these partners' facilities. If your content originates its playout with one of these partners, it makes the most sense to acquire directly from that source playout location. If your content is available via satellite downlink, Prime Video will work with our acquisition partners to downlink the satellite service(s) and transport the feeds over established direct fiber connections into Prime Video. All hardware and/or receivers required to downlink content via satellite, especially if there is any encryption on the source feed(s), will need to be provided in advance to Prime Video by the channel partner. There should be redundant downlinks available. Delivery via IP Prime Video's preference is to directly connect with the playout or acquisition facility from which the signals are being contributed. If the signal is available in a public data center it may be possible to directly connect with the partner within the data center, or via the data center. If it isn't possible to connect directly with the partner, under some circumstances Prime Video will support contribution of signals over the internet and/or via AWS site to site VPN. In order to support this, the partner must deliver the source feeds over at least two diverse internet connections. The partner must also support delivery via Zixi protocol in order to ensure that the signals are delivered reliably.

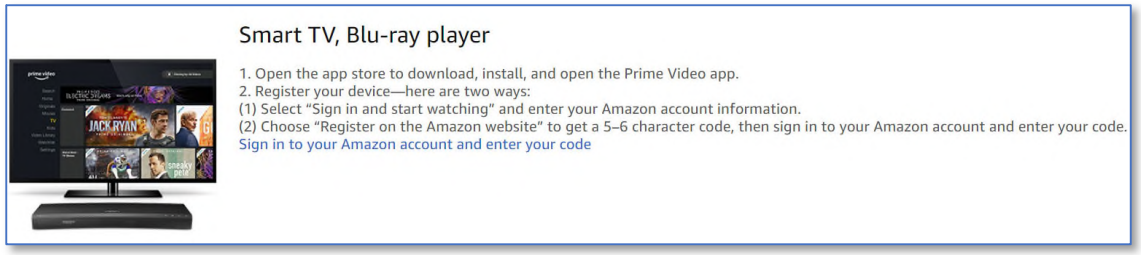
Claim Limitation	Exemplary Amazon Infringement
	DEFS-NLG_0001316 For example, the Amazon '592 Accused Products can receive a movie selected from Prime Video with Live TV and begin to play the selected program from the time of selection, which may be at a midstream part of the program. See discussion above with respect to limitation [1A]. Amazon also induces customers to download the Prime Video app onto third-party devices. Amazon additionally induces customers to stream content using Prime Video via a web browser on third-party devices. These third-party devices (with the Prime Video app installed and/or that stream Prime Video via a web browser) each includes a tuner that receives (via Prime Video with Live TV) selected digital moving image content in the same way as described above. Additionally, such third-party devices (with the Prime Video app installed and/or that stream Prime Video via a web browser) that comply with the FCC DTV mandate (such as the Fire TV Edition products) each includes a tuner that receives the selected digital moving image content in the same way as describe above.   https://www.amazon.com/gp/video/splash/device_linking

Claim Limitation	Exemplary Amazon Infringement
[1C]: an I/O interface that receives from the second provider the digital moving image content including entire data of the digital moving image content from the opening part to the ending part of the integral program same as the integral program received from the first provider, the I/O interface locating the integral program in accordance with information from the tuner at the time of selection by the remote controller;	The Amazon '592 Accused Products infringe this limitation as they each includes an I/O interface that receives from the second provider the digital moving image content including entire data of the digital moving image content from the opening part to the ending part of the integral program same as the integral program received from the first provider, the I/O interface locating the integral program in accordance with information from the tuner at the time of selection by the remote controller. For example, each Amazon '592 Accused Product includes an I/O interface that receives from the second provider (i.e., Amazon) the digital moving image content including entire data of the digital moving image content from the opening part to the ending part of the integral program same as the integral program received from the first provider (i.e. broadcaster such as Lifetime), the I/O interface locating the integral program in accordance with information from the tuner at the time of selection by the remote controller. For example, a program that a viewer accessed through Prime Video with Live TV with an Amazon '592 Accused Product may also be available for viewing from Prime Video via the I/O interface of the Amazon '592 Accused Product. The I/O interface may locate the program in accordance with a program name of the program that the tuner provided when giving access to the live version of the content via Prime Video with Live TV.

Claim Limitation	Exemplary Amazon Infringement
	 

Claim Limitation	Exemplary Amazon Infringement
	 

Claim Limitation	Exemplary Amazon Infringement
	  **Once Upon a Main Street, available to buy and download from Amazon (December 26, 2023 at 1:24 pm)** Amazon also induces customers to download the Prime Video app onto third-party devices. Amazon additionally induces customers to stream content using Prime Video via a web browser on third-party devices. Such third-party devices with the Prime Video app installed and/or that stream Prime Video via a web browser include an I/O interface in the same way as described above.

Claim Limitation	Exemplary Amazon Infringement
	  https://www.amazon.com/gp/video/splash/device_linking

Claim Limitation	Exemplary Amazon Infringement
[1D]: a television display that shows the digital moving image contents from the first provider and the second provider; and	The Amazon '592 Accused Products each includes a television display that shows the digital moving image contents from the first provider and the second provider For example, the accused Amazon smart TVs[5] each include a television display that shows the digital moving image contents from the first provider (*i.e.*, broadcaster such as Lifetime) and the second provider (*i.e.*, Amazon).

[5] *E.g.*, Amazon Fire TV (including the 2-Series, 4-Series, Omni Series, and Omni QLED Series) and Fire TV Edition (including TVs provided by third-parties such as Panasonic, Insignia, TCL, Hisense, and Toshiba with the Fire TV interface embedded); Echo Show (first generation); Echo Show (second generation); Echo Show 5 (first generation); Echo Show 5 (second generation); Echo Show 5 (third generation); Echo Show 8 (first generation); Echo Show 8 (second generation); Echo Show 8 (third generation); Echo Show 10; Echo Show 15

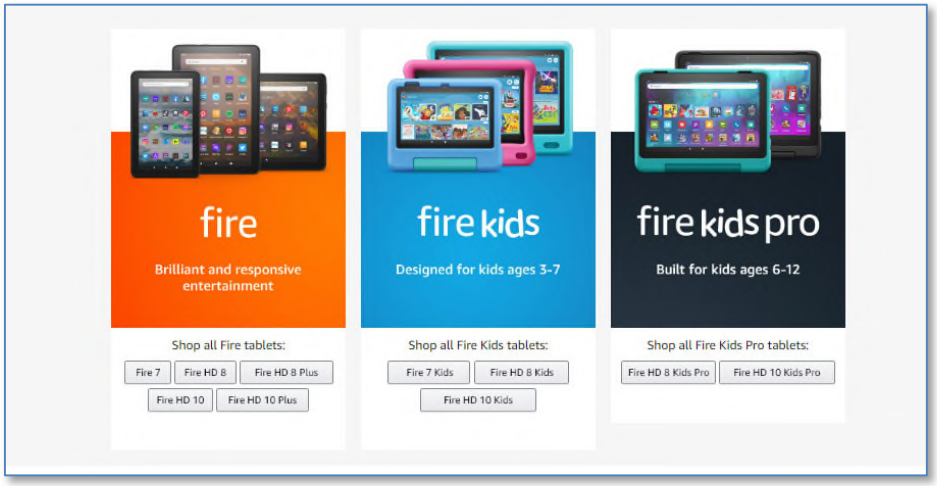
Claim Limitation	Exemplary Amazon Infringement



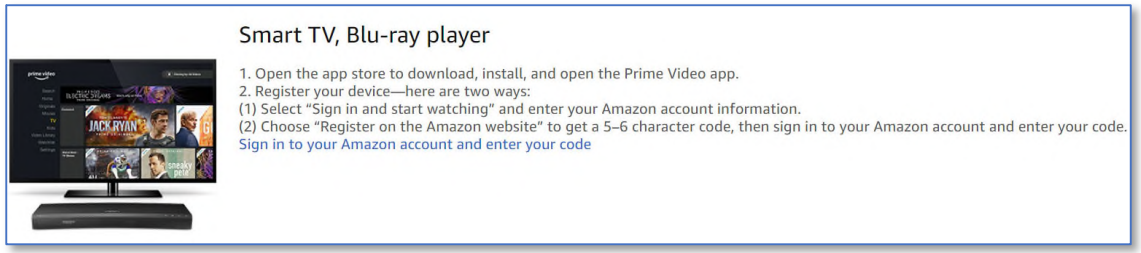
https://www.amazon.com/b?ie=UTF8&node=8521791011

As another example, each of the accused Fire tablets[6] includes a television display that shows the digital moving image contents from the first provider and the second provider.

[6] *E.g.*, Fire tablets (fourth generation through thirteenth generation, all sizes)

Claim Limitation	Exemplary Amazon Infringement
	 https://www.amazon.com/Amazon-Fire-Tablet-Family/b?ie=UTF8&node=6669703011 Amazon also induces customers to connect certain other '592 Accused Products[7] to displays that shows the digital moving image contents from the first provider and the second provider. Amazon also induces customers to download the Prime Video app onto third-party devices. Amazon additionally induces customers to stream content using Prime Video via a web browser on third-party devices. Such third-party devices with the Prime Video app installed and/or that stream Prime Video via a web browser include a television display in the same way as described above.

[7] *E.g.*, Fire TV (box) (first generation); Fire TV (box) (second generation); Fire TV (box) (third generation); Fire TV (pendant); Fire TV Cube (first generation); Fire TV Cube (second generation); Fire TV Cube (third generation); Fire TV Stick (first generation); Fire TV Stick (second generation); Fire TV Stick (third generation); Fire TV Stick 4K (first generation); and Fire TV Stick 4K Max

Claim Limitation	Exemplary Amazon Infringement
	  https://www.amazon.com/gp/video/splash/device_linking
[1E]: a memory in a TV set computer that stores the entire data of the digital moving image content received by the I/O interface.	The Amazon '592 Accused Products each includes a memory in a TV set computer that stores the entire data of the digital moving image content received by the I/O interface. Each of the Amazon '592 Accused Products includes memory (e.g. cache memory) that is capable of storing the entire data of the digital moving image content received by the I/O interface during viewing through Prime Video (in video library). Additionally, Amazon customers can purchase and download the entire data of digital moving image contents (e.g. full movies and/or program episodes) from Prime Video, which are stored in long-term memory of various Amazon '592 Accused Products (e.g. Fire TV Edition products) and in all products executing the Amazon Prime Video app.

Claim Limitation	Exemplary Amazon Infringement

Download Prime Video Titles

To download Prime Video titles for offline viewing, you need a Fire tablet, or the Prime Video app for iOS, Android, macOS, or Windows 10.

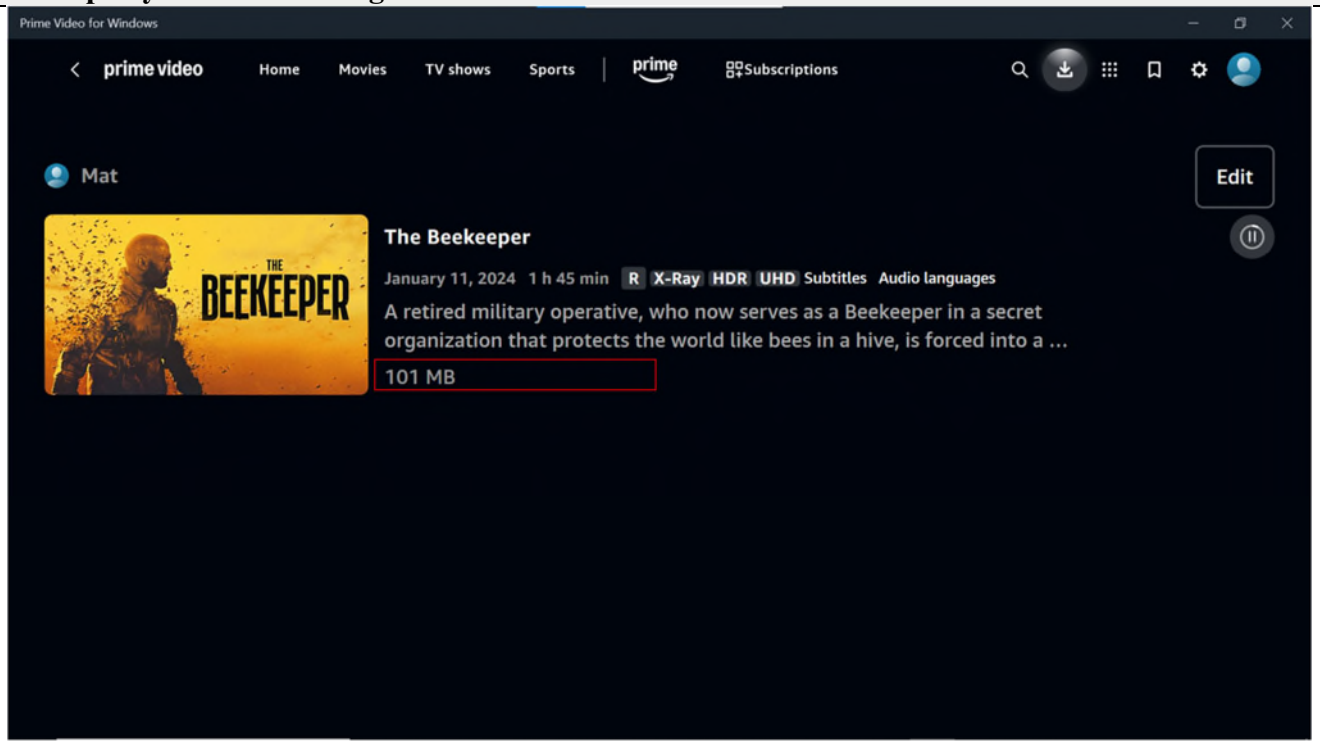


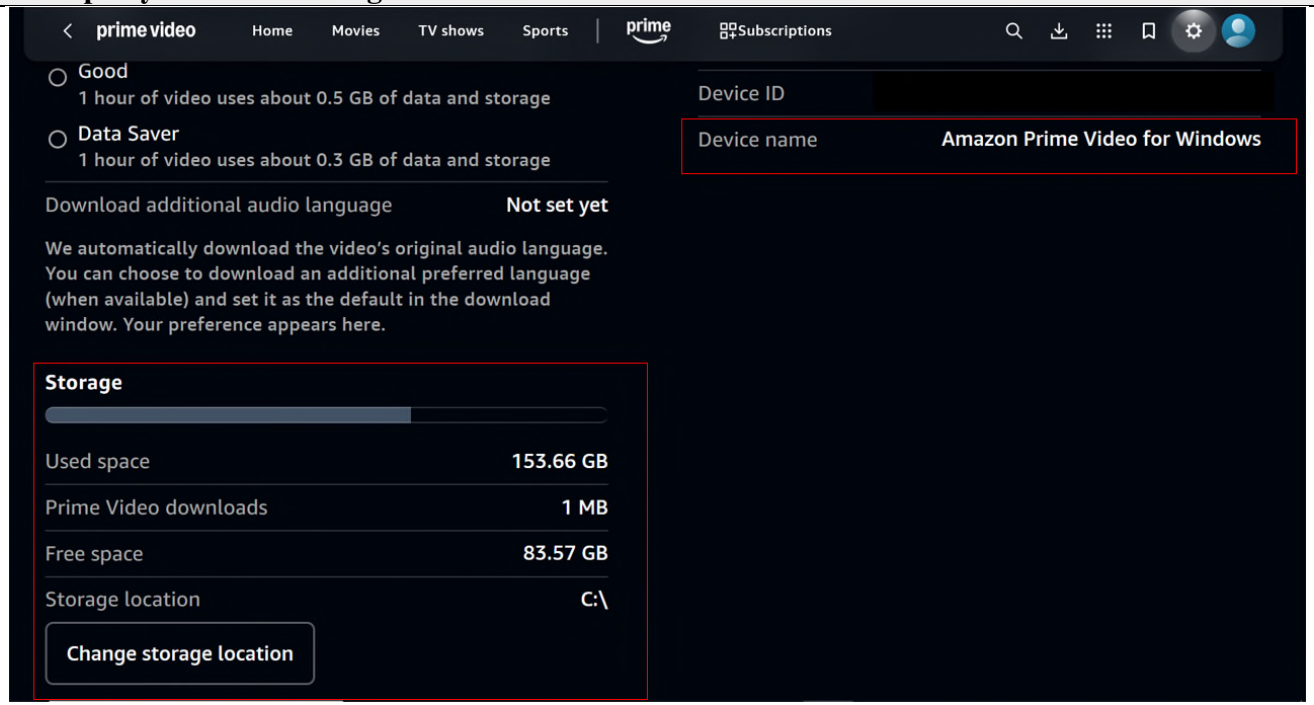
To download Prime Video titles, open the Prime Video app on your device, and find the title you want to download. In the Prime Video app for Android and Windows 10, you'll be able to select where to save downloaded titles. We don't recommend that downloads are saved onto USB-connected drives.

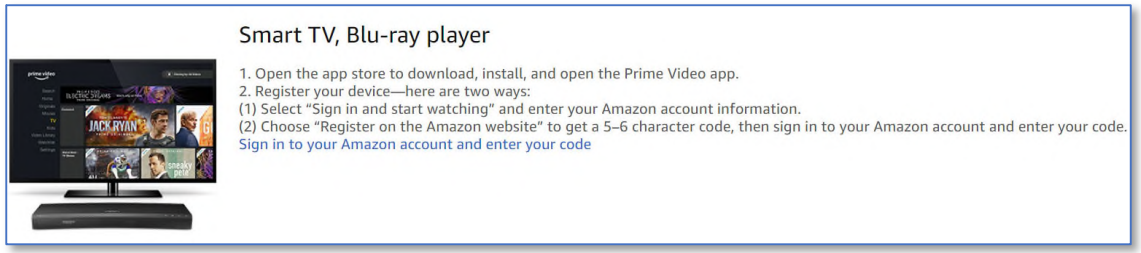
- **For movies**: Select the option to download the title from the detail page.
- **For TV shows**: There's an option download the entire season. To download individual episodes, select the download icon on the list of episodes.
  At present, the playback of downloaded content over Chromecast or Airplay isn't permitted. Offline playback to a television is possible with supported devices, using the appropriate adaptors.

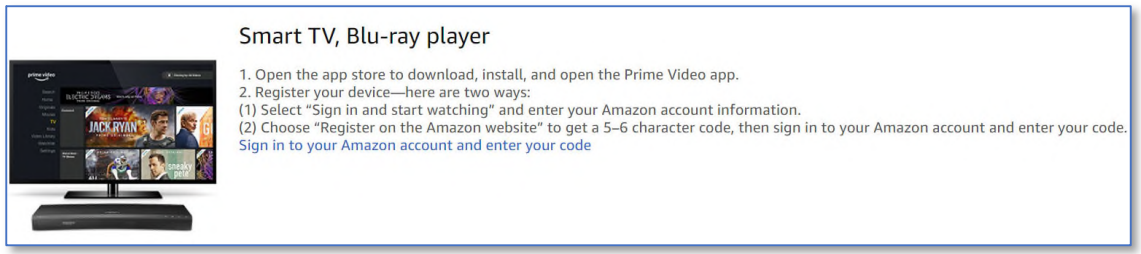
https://www.amazon.com/gp/help/customer/display.html?nodeId=GTDVUQFMY3GTZVX7

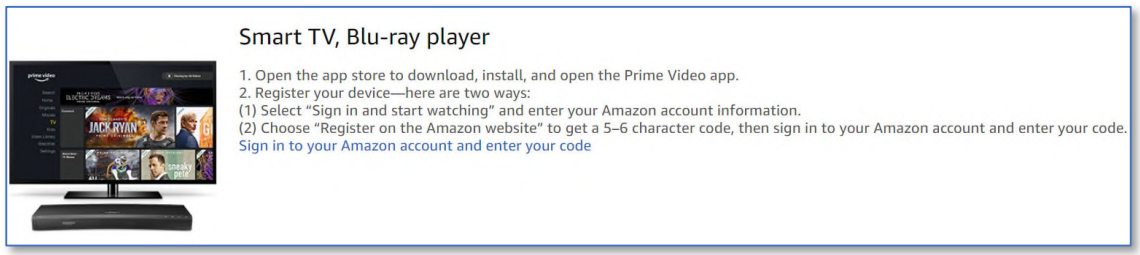
Once the Amazon Prime Video App is installed on a device, the user can select content for download. The downloaded content becomes available via the user account through the Windows App.

Claim Limitation	Exemplary Amazon Infringement
	 A user can also choose to download and store content at a storage location of the device (e.g., a memory in a TV set computer that stores the entire data of the digital moving image content).

Claim Limitation	Exemplary Amazon Infringement
	 Amazon also induces customers to download the Prime Video app onto third-party devices. Amazon additionally induces customers to stream content using Prime Video via a web browser on third-party devices. Such third-party devices with the Prime Video app installed and/or that stream Prime Video via a web browser include a memory in a TV set computer in the same way as described above.

Claim Limitation	Exemplary Amazon Infringement
	  https://www.amazon.com/gp/video/splash/device_linking
[2]: The receiving apparatus according to claim 1 further comprising a TV set processor that has the television display show a past part of the integral program which has been already provided by the first provider and retrieved from the memory in the TV set computer.	The Amazon '592 Accused Products each include a TV set processor that has the television display show a past part of the integral program which has been already provided by the first provider and retrieved from the memory in the TV set computer. According to the discussion above for limitation [1B], each of the Amazon '592 Accused Products can receive selected digital moving image content provided by the first provider, including at the midstream part of the integral program. Per the discussion above for limitation [1E], each of the Amazon '592 Products can download from the second provider (Amazon) and store the entire data of the digital moving image content (including the opening part to the ending part of the integral program, *see* discussion above for limitation [1C]) in long-term memory. Using the Amazon Prime Video app, devices can download content to a specified memory location and retrieve the content from that memory for display of the integral program (i.e., downloaded content), including display of a past part already provided by a broadcaster via Live TV (first provider).

Claim Limitation	Exemplary Amazon Infringement
	Each of the above-identified accused products include one or more TV set processors that can retrieve the entire data of the digital moving image content stored in memory including a past part of the integral program (such as the opening part) that precedes the midstream part which has been already provided by the first provider. Amazon also induces customers to download the Prime Video app onto third-party devices. Amazon additionally induces customers to stream content using Prime Video via a web browser on third-party devices. Such third-party devices with the Prime Video app installed and/or that stream Prime Video via a web browser include one or more TV set processors in the same way as described above.   https://www.amazon.com/gp/video/splash/device_linking
[3]: The receiving apparatus according to claim 2, wherein the past part is the	In each of the Amazon '592 Accused Products, the past part of the entire data of the digital moving image content includes the opening part of the integral program. See the discussion above for the limitation [1C] and claim [2].

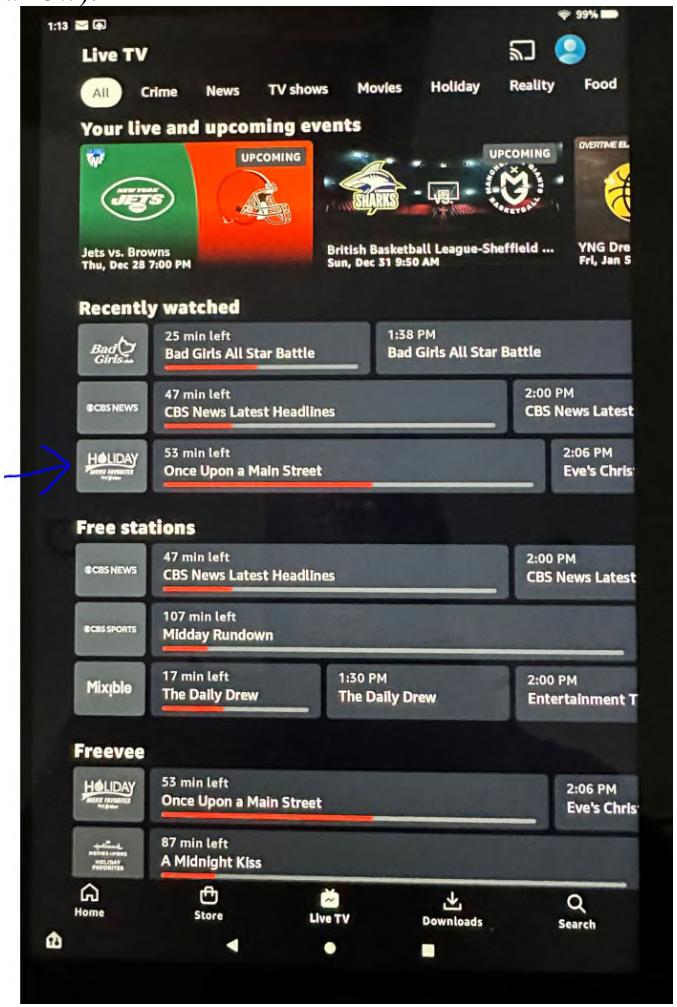
Claim Limitation	Exemplary Amazon Infringement
opening part of the integral program.	Amazon also induces customers to download the Prime Video app onto third-party devices. Amazon additionally induces customers to stream content using Prime Video via a web browser on third-party devices. Such third-party devices with the Prime Video app installed and/or that stream Prime Video via a web browser include a receiving apparatus in the same way as described above.   https://www.amazon.com/gp/video/splash/device_linking
[5]: The receiving apparatus according to claim 1, wherein the memory in the TV set computer keeps information necessary for the TV set computer to locate the integral program same as the	The Amazon '592 Accused Products each comprise a receiving apparatus with memory in the TV set computer that keeps information necessary for the TV set computer to locate the integral program same as the integral program received from the first provider. See the discussion above for the limitation [1C]. Alternately or additionally, for example, Prime Video with Live TV (first provider) and Amazon with Prime Video selections (second provider) share a landing page URL stored in Favorites or cache that can be used to locate a

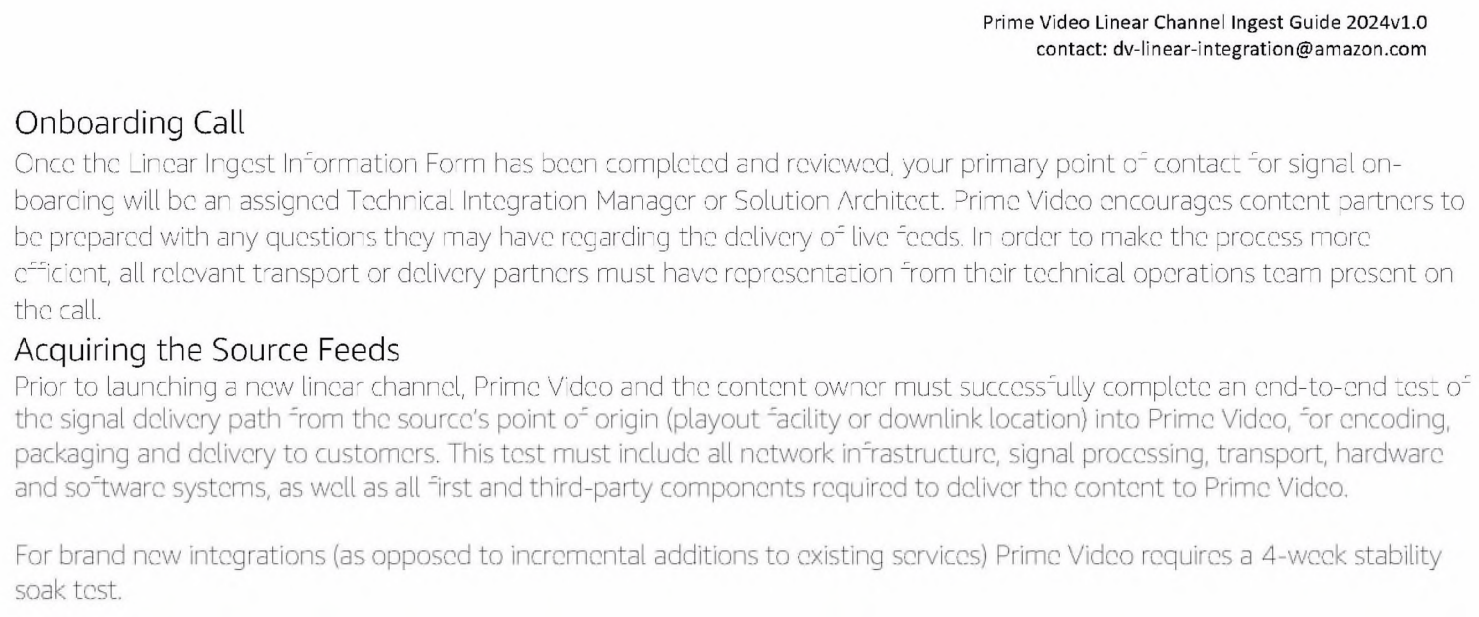
Claim Limitation	Exemplary Amazon Infringement
integral program received from the first provider.	program via Prime Video selections (second provider) that is the same program viewed via Prime Video with Live TV (first provider). Program name or another identifier may be stored based on user selections, as well. Amazon also induces customers to download the Prime Video app onto third-party devices. Amazon additionally induces customers to stream content using Prime Video via a web browser on third-party devices. Such third-party devices with the Prime Video app installed and/or that stream Prime Video via a web browser include a receiving apparatus in the same way as described above.
6[PRE]: A receiving apparatus configured to receive digital moving image contents from outside provider system of the digital moving image contents, the outside provider system being capable of providing a digital moving image content in accordance with a program schedule table predetermined by the provider and providing the digital moving image content independently f[ro]m the program schedule table, the receiving apparatus comprising:	The Amazon '592 Accused Products each comprise a receiving apparatus configured to receive digital moving image contents from outside provider system of the digital moving image contents, the outside provider system being capable of providing a digital moving image content in accordance with a program schedule table predetermined by the provider and providing the digital moving image content independently from the program schedule table. See the discussion above for the limitation 1[PRE]. Amazon also induces customers to download the Prime Video app onto third-party devices. Amazon additionally induces customers to stream content using Prime Video via a web browser on third-party devices. Such third-party devices with the Prime Video app installed and/or that stream Prime Video via a web browser include a receiving apparatus in the same way as described above.
[6A]: a remote controller that manually selects one of the digital moving image	The Amazon '592 Accused Products each include a remote controller that manually selects one of the digital moving image contents provided in accordance with a program schedule table, the selected digital moving image content being an integral program continuing from an opening part to an ending part by way of a midstream part.

Claim Limitation	Exemplary Amazon Infringement
contents provided in accordance with a program schedule table, the selected digital moving image content being an integral program continuing from an opening part to an ending part by way of a midstream part;	See the discussion above for the limitation [1A]. Amazon also induces customers to download the Prime Video app onto third-party devices. Amazon additionally induces customers to stream content using Prime Video via a web browser on third-party devices. Such third-party devices with the Prime Video app installed and/or that stream Prime Video via a web browser include a remote controller in the same way as described above.
[6B]: a tuner that receives the selected digital moving image content at the midstream part of the integral program at the time of selection by the remote controller;	The Amazon '592 Accused Products each include a tuner that receives the selected digital moving image content at the midstream part of the integral program at the time of selection by the remote controller. See the discussion above for the limitation [1B]. Amazon also induces customers to download the Prime Video app onto third-party devices. Amazon additionally induces customers to stream content using Prime Video via a web browser on third-party devices. Such third-party devices with the Prime Video app installed and/or that stream Prime Video via a web browser include a tuner in the same way as described above.
[6C]: I/O interface that receives the digital moving image content provided independently form the program schedule table including entire data of the digital moving image content from the opening part to the ending part of the integral program same as the integral program provided in accordance with a program schedule table, the I/O	The Amazon '592 Accused Products each include an I/O interface that receives the digital moving image content provided independently form the program schedule table including entire data of the digital moving image content from the opening part to the ending part of the integral program same as the integral program provided in accordance with a program schedule table, the I/O interface locating the integral program in accordance with information at the time of selection by the remote controller. See the discussion above for the limitation [1C]. Amazon also induces customers to download the Prime Video app onto third-party devices. Amazon additionally induces customers to stream content using Prime Video via a web browser on third-party devices. Such third-party devices with the Prime Video app installed and/or that stream Prime Video via a web browser include an I/O interface in the same way as described above.

Claim Limitation	Exemplary Amazon Infringement
interface locating the integral program in accordance with information at the time of selection by the remote controller;	
[6D]: a television display that shows the digital moving image contents provided in accordance with a program schedule table and the digital moving image content provided independently form the program schedule table; and	The Amazon '592 Accused Products each include a television display that shows the digital moving image contents provided in accordance with a program schedule table and the digital moving image content provided independently form the program schedule table. See the discussion above for the limitation [1D]. Amazon also induces customers to download the Prime Video app onto third-party devices. Amazon additionally induces customers to stream content using Prime Video via a web browser on third-party devices. Such third-party devices with the Prime Video app installed and/or that stream Prime Video via a web browser include a television display in the same way as described above.
[6E]: a memory in a TV set computer that stores the entire data of the digital moving image content received by the I/O interface.	The Amazon '592 Accused Products each include a memory in a TV set computer that stores the entire data of the digital moving image content received by the I/O interface. See the discussion above for the limitation [1E]. Amazon also induces customers to download the Prime Video app onto third-party devices. Amazon additionally induces customers to stream content using Prime Video via a web browser on third-party devices. Such third-party devices with the Prime Video app installed and/or that stream Prime Video via a web browser include a memory in the same way as described above.
[7]: The receiving apparatus according to claim 6 further comprising a TV set processor that has the television display show a	The Amazon '592 Accused Products each include a TV set processor that has the television display show a past part of the integral program which has been already provided in accordance with a program schedule table and retrieved from the memory in the TV set computer. See the discussion above for claim [2].

Claim Limitation	Exemplary Amazon Infringement
past part of the integral program which has been already provided in accordance with a program schedule table and retrieved from the memory in the TV set computer.	Amazon also induces customers to download the Prime Video app onto third-party devices. Amazon additionally induces customers to stream content using Prime Video via a web browser on third-party devices. Such third-party devices with the Prime Video app installed and/or that stream Prime Video via a web browser include a TV set processor in the same way as described above.
[8]: The receiving apparatus according to claim 7, wherein the past part is the opening part of the integral program.	In the Amazon '592 Accused Products the past part of the entire data of the digital moving image content is the opening part of the integral program. See the discussion above for the claims [2-3] Amazon also induces customers to download the Prime Video app onto third-party devices. Amazon additionally induces customers to stream content using Prime Video via a web browser on third-party devices. Such third-party devices with the Prime Video app installed and/or that stream Prime Video via a web browser include a receiving apparatus in the same way as described above.
[10]: The receiving apparatus according to claim 6 wherein the memory in the TV set computer keeps information necessary for the TV set computer to locate the integral program same as the integral program provided in accordance with a program schedule table.	The Amazon '592 Accused Products include the receiving apparatus including memory in the TV set computer that keeps information necessary for the TV set computer to locate the integral program same as the integral program provided in accordance with a program schedule table. See the discussion above for the limitation [5]. Amazon also induces customers to download the Prime Video app onto third-party devices. Amazon additionally induces customers to stream content using Prime Video via a web browser on third-party devices. Such third-party devices with the Prime Video app installed and/or that stream Prime Video via a web browser include a receiving apparatus in the same way as described above.
[11]: The receiving apparatus according to claim 1, wherein the first provider includes selectable sub providers, wherein the s [sic]	The Amazon '592 Accused Products include the first provider including selectable sub providers, wherein the remote controller selects the one of the digital moving image contents by means of selecting the sub provider, and wherein the one of the digital moving image contents is provided by the selected sub provider.

Claim Limitation	Exemplary Amazon Infringement
remote controller selects the one of the digital moving image contents by means of selecting the sub provider, and wherein the one of the digital moving image contents is provided by the selected sub provider.	For example, from the discussion above for the limitation 1[PRE], the first provider (Prime Video with Live TV) includes sub-providers that are listed in the program schedule table (one of the sub-providers is indicated by the arrow): 

Claim Limitation	Exemplary Amazon Infringement
	For example, from the discussion above for the limitation 1[B], sub-providers provide linear content and undergo an onboarding process to provide live feeds to Amazon Video:  Prime Video Linear Channel Ingest Guide 2024v1.0 contact: dv-linear-integration@amazon.com Onboarding Call Once the Linear Ingest Information Form has been completed and reviewed, your primary point of contact for signal on-boarding will be an assigned Technical Integration Manager or Solution Architect. Prime Video encourages content partners to be prepared with any questions they may have regarding the delivery of live feeds. In order to make the process more efficient, all relevant transport or delivery partners must have representation from their technical operations team present on the call. Acquiring the Source Feeds Prior to launching a new linear channel, Prime Video and the content owner must successfully complete an end-to-end test of the signal delivery path from the source's point of origin (playout facility or downlink location) into Prime Video, for encoding, packaging and delivery to customers. This test must include all network infrastructure, signal processing, transport, hardware and software systems, as well as all first and third-party components required to deliver the content to Prime Video. For brand new integrations (as opposed to incremental additions to existing services) Prime Video requires a 4-week stability soak test. Amazon also induces customers to download the Prime Video app onto third-party devices. Amazon additionally induces customers to stream content using Prime Video via a web browser on third-party devices. Such third-party devices with the Prime Video app installed and/or that stream Prime Video via a web browser include a receiving apparatus in the same way as described above.
[12]: The receiving apparatus according to claim 1, wherein the digital moving image contents is provided	In the Amazon '592 Accused Products the digital moving image contents is provided by the first provider by streaming technology in accordance with the program schedule table.

Claim Limitation	Exemplary Amazon Infringement
by the first provider by streaming technology in accordance with the program schedule table.	As explained in the discussion of limitations 1[PRE] and 1[B], the digital moving image contents provided by the first provider (i.e. the broadcaster) via Prime Video with Live TV are provided by streaming technology in accordance with the program schedule table. Amazon also induces customers to download the Prime Video app onto third-party devices. Amazon additionally induces customers to stream content using Prime Video via a web browser on third-party devices. Such third-party devices with the Prime Video app installed and/or that stream Prime Video via a web browser include a receiving apparatus in the same way as described above.

APPENDIX B

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AMAZON.COM, INC.,
AMAZON.COM SERVICES LLC,
AMAZON WEB SERVICES, INC., and
TWITCH INTERACTIVE, INC.
Petitioner

v.

NL GIKEN INC.
Patent Owner

Inter Partes Review No.: IPR2025-00050

DEFAULT 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.

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

(C) 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.

(D) In-house counsel. In-house counsel of a party.

(E) 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.

(F) 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.

AMAZON.COM, INC. V. NL GIKEN INC.
Case No. IPR2025-00050
U.S. Patent No. 10,880,592

Standard Acknowledgment 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 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.

Executed on _____, 20____

_____