

From: [Director Discretionary Decision](#)
To: [Gordon, Lori A](#); [Director DI](#); [Director Discretionary Decision](#); [Trials](#)
Cc: [Dokhanchy, Reza](#); [Meunier, William](#); [Rizk, Adam](#); [Renaud, Michael](#); [Agarwal, Pavan K.](#); [Houston, Michael R.](#); [Goma, Tawfik](#); [Konstantakopoulos, Theodoros](#)
Subject: RE: IPR2025-01054, -1082: Authorization to File Motion for Entry of a Protective Order
Date: Monday, December 8, 2025 9:24:16 AM
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Petitioner may file a motion for entry of the negotiated protective order.

From: Gordon, Lori A <LoriGordon@goodwinlaw.com>
Sent: Friday, December 5, 2025 10:15 PM
To: Director_DI <Director_DI@uspto.gov>; Director_Discretionary_Decision <Director_Discretionary_Decision@uspto.gov>; Trials <Trials@USPTO.GOV>
Cc: Dokhanchy, Reza <RDokhanchy@mintz.com>; Meunier, William <WAMeunier@mintz.com>; Rizk, Adam <ARizk@mintz.com>; Renaud, Michael <MTRenaud@mintz.com>; Agarwal, Pavan K. <PAgarwal@foley.com>; Houston, Michael R. <MHouston@foley.com>; Goma, Tawfik <TAGoma@mintz.com>; Konstantakopoulos, Theodoros <tkonstantakopoulos@goodwinlaw.com>
Subject: IPR2025-01054, -1082: Authorization to File Motion for Entry of a Protective Order

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IPR2025-01054

IPR2025-01082

Dear Honorable Director –

The parties have finished negotiation of a protective order in the above-referenced proceedings. Petitioner in the above-referenced proceedings seeks authorization to file a motion for entry of the negotiated protective order. Patent Owner does not oppose Petitioner's request or the proposed motion. Petitioner seeks to file the motion within one-business day after authorization.

The Director previously authorized Petitioner to serve a request for production of the Intel and Samsung licenses raised in Patent Owner's request for Discretionary Denial. Petitioner served the request the same day, November 18. Patent Owner informed Petitioner that Intel required 10 business days of notice before the license could be produced. During that time-period, the parties negotiated modifications to the default protective order to cover highly confidential attorney's eyes-only designation of these documents. At the conclusion of the 10-day time-period, Patent Owner informed Petitioner that it was conferring with Intel regarding whether the license could be produced prior to the Board entering the agreed upon protective order in the proceeding.

This evening, Patent Owner's counsel informed Petitioner that Intel would not permit the license to be produced until the Board grants the motion for entry of protective order and enters the protective order in the proceeding.

Petitioner therefore seeks expedited consideration of the unopposed motion, if authorized.

The parties are available for a call if required and can provide updated availability.

Regards-

Lori A Gordon

Lead Counsel - Petitioner

Lori Gordon



Goodwin Procter LLP
1900 N Street, NW
Washington, DC 20036
o +1 202 346 4435
f +1 202 346 4444
LoriGordon@goodwinlaw.com



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