

From: [Director Discretionary Decision](#)
To: [Colette Woo](#); [Director Discretionary Decision](#)
Cc: [IPR60246-0006IP1@fr.com](#); [Kenneth Darby](#); [Nathan Lowenstein](#); [Kenneth Weatherwax](#); [McDole, Jamie](#); [MOSAID](#)
Subject: RE: IPR2025-01171 - Request for Authorization to File Motion to Enter Protective Order
Date: Thursday, August 28, 2025 1:35:00 PM

Patent Owner is authorized to file the motion.

From: Colette Woo <woo@lowensteinweatherwax.com>
Sent: Thursday, August 28, 2025 12:43 PM
To: Director_Discretionary_Decision <Director_Discretionary_Decision@uspto.gov>
Cc: IPR60246-0006IP1@fr.com; Kenneth Darby <kdarby@fr.com>; Nathan Lowenstein <lowenstein@lowensteinweatherwax.com>; Kenneth Weatherwax <weatherwax@lowensteinweatherwax.com>; McDole, Jamie <jmcdole@winstead.com>; MOSAID <mosaid_iprs@lowensteinweatherwax.com>
Subject: IPR2025-01171 - Request for Authorization to File Motion to Enter Protective Order

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Dear Honorable Director,

Patent Owner MOSAID Technologies, Inc. respectfully requests authorization to submit a Motion to Enter a Protective Order in the above-referenced case. Patent Owner proposes a modified protective order that adds “CONFIDENTIAL - ATTORNEYS’ EYES ONLY - PROTECTIVE ORDER MATERIAL” and “HIGHLY CONFIDENTIAL - OUTSIDE ATTORNEYS’ EYES ONLY - PROTECTIVE ORDER MATERIAL” categories with permissions reflecting those in the interim protective order in the district court action between the parties under which the parties have produced documents.

Counsel for Patent Owner has met and conferred with counsel for Petitioner, and Petitioner opposes the request. To be clear, Petitioner does not oppose Patent Owner’s added categories, but instead opposes the scope of the permissions within those categories.

If the Director deems a call necessary, the parties are available for a call from 1-5pm ET on 8/29 and 9/2.

Respectfully submitted,

Colette Woo | **Lowenstein & Weatherwax LLP**
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