

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MARVELL SEMICONDUCTOR, INC.,
Petitioner,

v.

CREDO TECHNOLOGY GROUP LTD.,
Patent Owner.

Case IPR2025-01220
U.S. Patent No. 11,032,111

MOTION FOR ENTRY OF PROTECTIVE ORDER

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

To facilitate the use of certain confidential Patent Owner and third-party information, the parties have agreed to an entry of a Protective Order in this proceeding. The parties agreed-upon Protective Order is provided as Exhibit 2033 in this proceeding. A marked-up comparison of the proposed protective order (Exhibit 2033) and the Board's default protective order showing the differences between the two is submitted as Exhibit 2034. The proposed Protective Order deviates from the Board's default protective order in only one respect. Specifically, it provides for a second, heightened level of confidentiality that is restricted to Outside Attorneys Eyes only.

A party seeking to protect confidential information may seek entry of a protective order in a proceeding before the Board. *See, e.g., Garmin Int'l, Inc. v. Cuozzo Speed Techs. LLC*, IPR2012-00001, Paper 34 (PTAB Mar 14, 2013). Upon a showing of good cause, the Board may enter a Protective Order to protect from public disclosure such confidential information as disclosed by a party during the course of a proceeding before the Board. *See* 37 CFR § 42.54. Patent Owner intends to submit certain evidence of objective indicia of non-obviousness, including confidential Patent Owner and third-party financial and licensing information. Patent Owner submits that, in light of the reasons discussed herein, the added limitations are necessary in this proceeding, and good cause exists to enter the proposed Protective Order.

The confidential information Patent Owner intends to rely on requires the entry of an “ATTORNEYS EYES ONLY PROTECTIVE ORDER MATERIAL” tier to protect sensitive financial and licensing information. This sensitive information would put Patent Owner and the third-parties at a competitive disadvantage if such information were to become public. Moreover, as Petitioner is a supplier of technology used in Patent Owner’s competitor’s products, Petitioner’s in-house legal team should similarly be excluded from receiving this sensitive information. The terms of the proposed Protective Order would not impose an undue burden on either party. Patent Owner accordingly seeks heightened protection for such materials disclosed in connection with this proceeding. The proposed changes do not affect access to confidential information for employees and representatives of the Patent and Trademark Office who have a need for access to the confidential information. The revisions are noted in redline showing changes from the Board’s Default Protective Order in Exhibit 2034.

As noted above, Petitioner has agreed to the proposed protective order. For the foregoing reasons, good cause exists for entering the proposed Protective Order (Exhibit 2033) in this proceeding.

IPR2025-01220
U.S. Patent No. 11,032,111

Date: June 2, 2026

Respectfully submitted,

/Charles M. McMahon/

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**CERTIFICATE OF COMPLIANCE WITH
TYPE-VOLUME LIMITATIONS**

I, the undersigned, do hereby certify that the foregoing Patent Owner Response, including footnotes, contains 410 words, as measured by the Word Count function of Microsoft Word as specified by 37 C.F.R. § 42.24(b)(2).

/Charles M. McMahon/

Charles M. McMahon

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e)(4), I hereby certify that on June 2, 2026, a true and correct copy of the foregoing was served by electronic mail upon the following counsel of record for Petitioner:

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