UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,

Petitioner,

v.

HEADWATER RESEARCH LLC,

Patent Owner

IPR2026-00138
Patent 9,609,544

PATENT OWNER'S RENEWED MOTION FOR ENTRY OF PROTECTIVE ORDER

Pursuant to Paper 16, Patent Owner Headwater Research LLC ("Patent Owner") moves for entry of the proposed protective order submitted as Exhibit 2019. Counsel for Patent Owner conferred with counsel for Petitioner, and the proposed protective order is agreed.

The proposed protective order is a narrow version of the Board's Default Protective Order, limited such that it only protects Exhibit 2001 with the confidentiality restrictions the Board already approved. *See* Paper 16 at 3–4 ("Exhibit 2001 may be disclosed in this case only to each party's outside attorney(s) of record and the employees of such outside attorney(s).").

A marked-up comparison showing every difference between the proposed protective order and the Default Protective Order is submitted as Exhibit 2020.

As the previously explained in Patent Owner's Motion to Seal (Paper 7), good cause exists for treating Exhibit 2001 as confidential and restricted to disclosure to the Board and outside counsel for Petitioner because it contains confidential business information of Patent Owner and third parties, and Patent Owner is bound by third-party confidentiality obligations regarding Exhibit 2001. Paper 7 at 1. Furthermore, the Board has already determined that good cause to seal Exhibit 2001. Reviewing Paper 7 and Exhibit 2001, the Board was "persuaded that good cause exists to seal this exhibit based on the record before us," and it conditionally granted the motion to seal. Paper 16, 3.

For the foregoing reasons, good cause exists for entering the proposed agreed protective order "to protect a party or person from disclosing confidential information." 37 C.F.R. § 42.54(a).

Patent Owner conferred with Petitioner, and Petitioner suggested this proposed protective order to address confidentiality issues in this proceeding; accordingly, this proposed protective order is agreed. To the extent the Board is inclined to deny this proposed protective order, Patent Owner requests that Exhibit 2001 be expunged from this proceeding (which Petitioner stated it does not oppose).

Date: August 12, 2026

Respectfully submitted,

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CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e))

The undersigned hereby certifies that the above document was served on August 12, 2025, by filing this document through the Patent Trial and Appeal Case Tracking System (P-TACTS) as well as delivering a copy via electronic mail upon the following attorneys of record for Petitioner:

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