From:	Cohen, Alexis
To:	Knight, Dustin M; Chen, Reuben; Pivovar, Adam; Chang, HanByul
Cc:	Khan, Omar; Nyman, Patrick E.; Graber, Jennifer L.; Macro, Laura; Moussa, Akkad Y.; Dennhardt, Jeffrey; Cohen, Alexis
Subject:	PGR2025-00084 & PGR2025-00088: Motions to Seal and For Entry of the Default Protective Order
Date:	Thursday, December 4, 2025 8:26:41 PM

Counsel,

I write regarding Petitioner's Motions to Seal and For Entry of the Default Protective Order.

As a preliminary matter, your motions are defective under 37 CFR § 42.54(a) because they do not "include a certification that the moving party has in good faith conferred or attempted to confer with other affected parties in an effort to resolve the dispute." As you are aware, Petitioner did not attempt to meet-and-confer with Patent Owner before filing. That is improper.

Further, under the Default Protective Order Petitioner seeks to have entered, Patent Owner will be granted access to Protective Order Material if it signs the Standard Acknowledgement. If Patent Owner were to agree to enter the Default Protective Order and sign the acknowledgment form, would Petitioner agree to providing us the search disclosure declaration? The answer to that question appears to be no, which is inconsistent with the Default Protective Order.

Please advise by Monday December 8 so that we can act accordingly under 37 CFR § 42.25. We may oppose the motions at least for Petitioner's failure to comply with regulation and for modifying the default protective order despite representing otherwise.

Regards,
Alexis

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