

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

EDWARDS LIFESCIENCES CORPORATION, EDWARDS
LIFESCIENCES LLC, AND EDWARDS LIFESCIENCES AG
Petitioners

v.

BOSTON SCIENTIFIC SCIMED, INC.
Patent Owner

Case IPR2017-00060
Patent 8,992,608 B2

**JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE
ORDER**

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Pursuant to the Final Rules of Practice for Trials Before the Patent Trial and Appeal Board and Judicial Review of Patent Trial and Appeal Board Decisions (77 Fed. Reg. 157, Aug. 14, 2012), 35 U.S.C. § 316, 37 C.F.R. § 42.54, and § A.2 of the Case Management and Scheduling Order entered in this proceeding, Patent Owner Boston Scientific Scimed, Inc. and Petitioners Edwards Lifesciences Corporation, Edwards Lifesciences LLC, and Edwards Lifesciences AG jointly move for entry of the Stipulated Protective Order attached hereto as Exhibit 1.

The Stipulated Protective Order is based on the Default Protective Order provided in Appendix B of the Trial Practice Guide, with modifications agreed upon by the Parties. These changes are proposed to harmonize the protective order with the Stipulated Protective Order in place in Case No. 16-275-SLR-SFR (D. Del.) between the same parties and to permit information from such litigation to be used in this proceeding, as well as to further ensure the preservation of confidentiality of information that may be submitted to the Board. A document comparing the Parties' Stipulated Protective Order to the Default Protective Order is attached hereto as Exhibit 2.

The Parties respectfully request that the Board enter the Stipulated Protective Order.

DATED: June 20, 2017

Respectfully submitted,

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