

**From:** [Director Discretionary Decision](#)  
**To:** [Buroker, Brian M.](#); [Director Discretionary Decision](#); [Trials](#)  
**Cc:** [Lu, Vivian](#); [Kieckhefer, L. Kieran](#); [Curtis, Nathan R.](#); [Emily Portuguese](#); [Barry K. Shelton](#); [Brian Melton](#); [Santos Garza](#); [Samuel Drezdzon](#); [Mark Siegmund](#); [Max Ciccarelli](#); [MTRIBBLE@SusmanGodfrey.com](mailto:MTRIBBLE@SusmanGodfrey.com); [Rachel Solis](#); [Richard Wojtczak](#); [RMagni@susmangodfrey.com](mailto:RMagni@susmangodfrey.com); [Tamar Lusztig](#); [Kenneth Weatherwax](#); [\\*\\*\\* GDC-NVIDIA-IPR](#); [Nathan Lowenstein](#); [Colette Woo](#)  
**Subject:** RE: IPR2025-00609/610 - Request for Permission to Submit a Protective Order  
**Date:** Wednesday, August 27, 2025 9:08:58 AM

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Petitioner may file the motions to seal and protective order.

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**From:** Buroker, Brian M. <BBuroker@gibsondunn.com>  
**Sent:** Tuesday, August 26, 2025 5:56 PM  
**To:** Director\_Discretionary\_Decision <Director\_Discretionary\_Decision@uspto.gov>; Trials <Trials@USPTO.GOV>  
**Cc:** Lu, Vivian <VLu@gibsondunn.com>; Kieckhefer, L. Kieran <KKieckhefer@gibsondunn.com>; Curtis, Nathan R. <NCurtis@gibsondunn.com>; Emily Portuguese <EPortuguese@susmangodfrey.com>; Barry K. Shelton <bshelton@sheltoncoburn.com>; Brian Melton <BMelton@SusmanGodfrey.com>; Santos Garza <SGarza@susmangodfrey.com>; Samuel Drezdzon <SDrezdzon@susmangodfrey.com>; Mark Siegmund <msiegmund@cjsjlaw.com>; Max Ciccarelli <max@ciccarellilawfirm.com>; MTRIBBLE@SusmanGodfrey.com; Rachel Solis <RSolis@susmangodfrey.com>; Richard Wojtczak <rwojtczak@susmangodfrey.com>; RMagni@susmangodfrey.com; Tamar Lusztig <TLusztig@susmangodfrey.com>; Kenneth Weatherwax <weatherwax@lowensteinweatherwax.com>; \*\*\* GDC-NVIDIA-IPR <GDC-NVIDIA-IPR@gibsondunn.com>; Nathan Lowenstein <lowenstein@lowensteinweatherwax.com>; Colette Woo <woo@lowensteinweatherwax.com>  
**Subject:** Re: IPR2025-00609/610 - Request for Permission to Submit a Protective Order

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Honorable Board and Director Discretionary Decision team:

We have two more IPRs involving the same parties for which discretionary denial oppositions are due on August 28, 2025. Petitioners seek authorization to file portions of the oppositions and certain exhibits under seal using the same agreed protective order proposed in IPR2025-00606 and 608.

Please confirm that we have authorization to file motions to seal and a proposed protective order in IPR2025-00609 and 00610 as well.

Thanks,  
Brian  
Reg. No. 39,125  
Counsel for Petitioners

**Brian M. Buroker**

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**From:** Director\_Discretionary\_Decision <[Director\\_Discretionary\\_Decision@uspto.gov](mailto:Director_Discretionary_Decision@uspto.gov)>

**Date:** Monday, July 7, 2025 at 5:26 PM

**To:** "Trials@uspto.gov" <[Trials@USPTO.GOV](mailto:Trials@USPTO.GOV)>, Brian Buroker <[BBuroker@gibsondunn.com](mailto:BBuroker@gibsondunn.com)>

**Cc:** Vivian Lu^ <[VLu@gibsondunn.com](mailto:VLu@gibsondunn.com)>, "L. Kieran Kieckhefer^"

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**Subject:** RE: IPR2025-00608/00606 - Request for Permission to Submit a Protective Order

Petitioner is authorized to file a motion to seal its oppositions to Patent Owner's request for discretionary denial and for entry of a protective order, and should include the proposed protective order as an exhibit. Please refer to 37 CFR 42.54 and the Consolidated Trial Practice Guide for more information.

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**From:** Trials <[Trials@USPTO.GOV](mailto:Trials@USPTO.GOV)>

**Sent:** Monday, July 7, 2025 1:24 PM

**To:** Director\_Discretionary\_Decision <[Director\\_Discretionary\\_Decision@uspto.gov](mailto:Director_Discretionary_Decision@uspto.gov)>

**Cc:** Trials <[Trials@USPTO.GOV](mailto:Trials@USPTO.GOV)>

**Subject:** FW: IPR2025-00608/00606 - Request for Permission to Submit a Protective Order

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**From:** Buroker, Brian M. <[BBuroker@gibsondunn.com](mailto:BBuroker@gibsondunn.com)>

**Sent:** Monday, July 7, 2025 11:35 AM

**To:** Trials <[Trials@USPTO.GOV](mailto:Trials@USPTO.GOV)>

**Cc:** Lu, Vivian <[VLu@gibsondunn.com](mailto:VLu@gibsondunn.com)>; Kieckhefer, L. Kieran <[KKieckhefer@gibsondunn.com](mailto:KKieckhefer@gibsondunn.com)>; Curtis, Nathan R. <[NCurtis@gibsondunn.com](mailto:NCurtis@gibsondunn.com)>; Emily Portuguese <[EPortuguese@susmangodfrey.com](mailto:EPortuguese@susmangodfrey.com)>; Barry K. Shelton <[bshelton@sheltoncoburn.com](mailto:bshelton@sheltoncoburn.com)>; Brian Melton <[BMelton@SusmanGodfrey.com](mailto:BMelton@SusmanGodfrey.com)>; Santos Garza <[SGarza@susmangodfrey.com](mailto:SGarza@susmangodfrey.com)>; Samuel Drezdson <[SDrezdson@susmangodfrey.com](mailto:SDrezdson@susmangodfrey.com)>; Mark Siegmund <[msiegmund@cjsjlaw.com](mailto:msiegmund@cjsjlaw.com)>; Max Ciccarelli <[max@ciccarellilawfirm.com](mailto:max@ciccarellilawfirm.com)>; [MTRIBBLE@SusmanGodfrey.com](mailto:MTRIBBLE@SusmanGodfrey.com); Rachel Solis <[RSolis@susmangodfrey.com](mailto:RSolis@susmangodfrey.com)>; Richard Wojtczak <[rwojtczak@susmangodfrey.com](mailto:rwojtczak@susmangodfrey.com)>; [RMagni@susmangodfrey.com](mailto:RMagni@susmangodfrey.com); Tamar Lusztig <[TLusztig@susmangodfrey.com](mailto:TLusztig@susmangodfrey.com)>; Kenneth Weatherwax <[weatherwax@lowensteinweatherwax.com](mailto:weatherwax@lowensteinweatherwax.com)>; \*\*\* GDC-NVIDIA-IPR <[GDC-NVIDIA-IPR@gibsondunn.com](mailto:GDC-NVIDIA-IPR@gibsondunn.com)>; Nathan Lowenstein <[lowenstein@lowensteinweatherwax.com](mailto:lowenstein@lowensteinweatherwax.com)>; Colette Woo <[woo@lowensteinweatherwax.com](mailto:woo@lowensteinweatherwax.com)>

**Subject:** IPR2025-00608/00606 - Request for Permission to Submit a Protective Order

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To the Honorable Board,

Petitioner seeks entry of a Protective Order in the above-referenced matter in advance of its forthcoming oppositions to Patent Owner's discretionary denial filed in the two above-referenced IPR proceedings due on July 14 and 15. Petitioner anticipates seeking a motion to seal portions of its response and at least one exhibit based on content that the Patent Owner has designated Attorneys' Eyes Only in the related district court litigation. Patent Owner has agreed to the language in the draft Protective Order that is based on the PTAB's Default Protective Order, with the addition of Attorneys Eyes' Only and Outside Attorneys' Eyes Only designations to correspond to designations in the Protective Order being negotiated for the district court action. If a motion is required, Petitioner seeks permission to file such a motion. If the Board wants to have a call to discuss this issue, the parties are available from 1-5pm ET on July 9-11.

Thanks,

Brian

**Brian M. Buroker**

Partner

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