

From: [Director Discretionary Decision](#)
To: [Colette Woo](#); [Director Discretionary Decision](#)
Cc: [Taeg Sang \(Tim\) Cho](#); [Benjamin Rodd](#); [Lindsey Miller](#); [Laura Avena](#); [IBM-SFI-IPR-Service](#); [Nathan Lowenstein](#); [Kenneth Weatherwax](#); [Elliott, Stephen J.](#); [Iancu, Andrei](#); ["guziord@sullcrom.com"](#); [Sanders, Haley M.](#); [Gross, Alexander N.](#); [Halpern, Aviv S.](#); [Burke, Emma M.](#); [lushi@sullcrom.com](#); [devinem@sullcrom.com](#); [Michael Cosley](#)
Subject: RE: IPR2025-01200, -01201, -01202 - Request for Authorization to Submit Motion for Protective Order and to Seal
Date: Thursday, October 2, 2025 4:30:13 PM

Patent Owner may submit a motion for a protective order.

From: Colette Woo <woo@lowensteinweatherwax.com>
Sent: Thursday, October 2, 2025 3:45 PM
To: Director_Discretionary_Decision <Director_Discretionary_Decision@uspto.gov>
Cc: Taeg Sang (Tim) Cho <tcho@desmaraisllp.com>; Benjamin Rodd <BRodd@desmaraisllp.com>; Lindsey Miller <LMiller@desmaraisllp.com>; Laura Avena <LAvena@desmaraisllp.com>; IBM-SFI-IPR-Service <IBM-SFI-IPR-Service@desmaraisllp.com>; Nathan Lowenstein <lowenstein@lowensteinweatherwax.com>; Kenneth Weatherwax <weatherwax@lowensteinweatherwax.com>; Elliott, Stephen J. <elliotts@sullcrom.com>; Iancu, Andrei <iancua@sullcrom.com>; 'guziord@sullcrom.com' <guziord@sullcrom.com>; Sanders, Haley M. <sandersh@sullcrom.com>; Gross, Alexander N. <grossa@sullcrom.com>; Halpern, Aviv S. <halperna@sullcrom.com>; Burke, Emma M. <burkeem@sullcrom.com>; lushi@sullcrom.com; devinem@sullcrom.com; Michael Cosley <Cosley@lowensteinweatherwax.com>
Subject: IPR2025-01200, -01201, -01202 - Request for Authorization to Submit Motion for Protective Order and to Seal

CAUTION: This email has originated from a source outside of USPTO. **PLEASE CONSIDER THE SOURCE** before responding, clicking on links, or opening attachments.

Dear Honorable Director,

Patent Owner Security First Innovations LLC respectfully requests authorization to submit a Motion to Enter the Default Protective Order and to Seal in the above-referenced cases.

Counsel for Patent Owner has met and conferred with counsel for Petitioner. Petitioner does not oppose the request or any authorized motion to seal with respect to Exhibits 2010, 2011, 2015, 2016, 2017, and 2026; Petitioner takes no position on remaining exhibits labeled confidential.

If the Director deems a call necessary, the parties are available for a call on 10/6 at 1PM-2PM ET, 10/7 at 2PM-5PM ET, and 10/9 at 2PM-3PM ET.

Best,

Colette Woo | Lowenstein & Weatherwax LLP
1016 Pico Blvd, Santa Monica, CA 90405
Office: 310.307.4500