

From: [Director Discretionary Decision](#)
To: [Donald R. Banowit](#); [Director DI](#); [Trials](#); [Director Discretionary Decision](#)
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Subject: RE: IPR2025-01484 and IPR2025-01527 // Authorization to File Motion for Entry of a Protective Order
Date: Monday, December 22, 2025 10:44:44 AM
Attachments: [image001.png](#)
[image002.png](#)

Petitioner may file a motion for entry of the negotiated protective order.

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IPR2025-01484

IPR2025-01527

Dear Honorable Director,

The parties have finished negotiation of a protective order in the above-referenced proceedings. Petitioner seeks authorization to file a motion for entry of the negotiated protective order. Patent Owner does not oppose Petitioner's request or the proposed motion. Petitioner seeks to file the motion within one-business day after authorization.

In prior proceedings between the parties (IPR2025-01054 and IPR2025-01082), the Director previously authorized Petitioner to serve a request for production of Intel and Samsung licenses that were raised in Patent Owner's request for Discretionary Denial filed in both of these proceedings. Patent Owner's request for Discretionary Denial in the instant proceedings (IPR2025-01484 and IPR2025-01527) raises the same arguments based on the same Intel and Samsung licenses.

Also in these prior proceedings (IPR2025-01054 and IPR2025-01082), the Director previously authorized Petitioner to file a motion for entry of the negotiated protective order, and the motions

were granted on December 12 (Paper 10 and 9, respectively). The protective order entered in these prior proceedings is the same protective order that Petitioner seeks to have entered here.

In the instant proceedings, the parties have conferred, and Patent Owner has agreed to produce the same licenses here as agreed to in the prior proceedings (IPR2025-01054 and IPR2025-01082).

The parties are available for a call if required and can provide availability if needed.

Regards,
Donald R. Banowit
Counsel for Petitioner



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