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To: Director_DI@uspto.gov
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Subject: PGR2025-00085 and PGR2025-00088: Opposition to Motion to Seal and Motion for Entry of Default Protective Order
Date: Thursday, December 18, 2025 3:48:10 PM

Dear Honorable Director,

We write regarding Petitioner's Motion to Seal and Request for *In Camera* Review and Motion for Entry of Default Protective Order in PGR2025-00084 (Paper No. 8) and PGR2025-00088 (Paper No. 8). Contrary to 37 CFR § 42.54, Petitioner did not confer or attempt to confer with Patent Owner prior to filing its motion. Further, although Petitioner has moved for entry of the Default Protective Order, Petitioner has indicated that it will not comply with the Default Protective Order if it is entered. Specifically, it has refused to confirm whether it will allow Patent Owner to access "Protective Order Material," namely the marked Search Disclosure Declaration, if Patent Owner signs the Standard Acknowledgement for Access to Protective Order Material. After Patent Owner notified Petitioner of its concerns, rather than agreeing to confer, Petitioner filed belated redactions of its Search Disclosure Declaration a week after its initial filing. Petitioner's Motion to Seal and Request for *In Camera* Review appears particularly problematic because the redacted Search Disclosure Declaration demonstrates that the declaration is not limited to describing search strategies but instead contains several characteristics and arguments about Patent Owner's conduct and the challenged patents to which Patent Owner cannot respond, raising significant due process concerns. *E.g.*, Search Disclosure Decls., Paras. 4, 6.

Patent Owner therefore intends to oppose Petitioner's Motion to Seal and Request for *In Camera* Review and Motion for Entry of Default Protective Order. Patent Owner will file its opposition brief by December 26, 2026, in compliance with 37 CFR § 42.25. Please let Patent Owner know if you intend to set a different briefing schedule.

Best regards,
Alexis

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CYTEK V. BECKMAN
PGR2025-00084
BECKMAN 2052

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