

[REDACTED]

**From:** [Robert Scheffel](#)  
**To:** [Zhu, Frank](#); [Williams, Eliot D.](#); [Tempesta, Jennifer C.](#); [Zhang, Boyang](#)  
**Cc:** [Matthew Dowd](#); [Joshua Goldberg](#)  
**Subject:** Re: IPR2023-00365 -- U.S. Patent No. 8,591,852 -- Chengda v. Doriamo  
**Date:** Friday, April 7, 2023 2:47:44 PM  
**Attachments:** [Chengda Doriamo Default Protective Order.docx](#)

---

[EXTERNAL EMAIL]

Frank

Further to our email below, Doriamo will be filing certain documents relating to [REDACTED]. Doriamo will also file a motion to seal and a motion for a Protective Order, as previously noted. We intend to serve all documents as filed because they are confidential to both Chengda and Doriamo, and your client is in possession of the documents, including [REDACTED].

For your convenience, we attach a copy of [REDACTED]. The other documents and information relate to [REDACTED] and current communications between the parties about the present dispute.

Attached also please find a draft of the Default Protective Order. Please review, and if it is acceptable, provide your authorization to sign on behalf of Chengda.

With respect to our motion to seal and motion for a protective order, we prepared the following paragraph concerning our discussions. Please let us know if you have any disagreement with our language.

“Patent Owner has conferred with Petitioner through counsel via email. Petitioner stated that, to the extent that parties’ submissions in the above-referenced IPR contain confidential information of both parties, Petitioner agrees that such submissions should be sealed under the PTAB’s Default Protective Order. Lead counsel for Petitioner has executed the Default Protective Order, included with Appendix A of this motion.”

We intend to file our motions by Monday, April 10, 2023.

Accordingly, unless we hear from you to the contrary by 5 PM, on Monday, April 10, 2023, we will understand that Chengda agrees that the above-noted documents and information should be filed under seal and subject to the protective order.

If you would like to discuss any of these issues further, please let us know.

Regards,  
Robert

Robert J. Scheffel  
[Dowd Scheffel PLLC](#)

[www.dowdscheffel.com](http://www.dowdscheffel.com)

1717 Pennsylvania Ave., Ste. 1025

Washington, DC 20006

(202) 559-9175 (o)

(703) 859-2959 (m)

<http://www.linkedin.com/in/robertscheffel>

---

**From:** Zhu, Frank <frank.zhu@BakerBotts.com>

**Date:** Wednesday, March 29, 2023 at 10:19 AM

**To:** Robert Scheffel <rscheffel@dowdscheffel.com>, Williams, Eliot D.

<Eliot.Williams@BakerBotts.com>, Tempesta, Jennifer C.

<jennifer.tempesta@bakerbotts.com>, Zhang, Boyang <boyang.zhang@bakerbotts.com>

**Cc:** Matthew Dowd <mdowd@dowdscheffel.com>, Joshua Goldberg

<JGoldberg@Nathlaw.com>

**Subject:** RE: IPR2023-00365 -- U.S. Patent No. 8,591,852 -- Chengda v. Doriomo

Counsel,

To the extent that parties' submissions in the above referenced IPR contain confidential information of both parties, we agree that such submissions should be sealed under the PTAB's Default Protective Order. We, however, cannot agree that any particular document is properly designated as confidential under the Protective Order without first reviewing the document. Accordingly, Petitioner reserves the right to challenge any such designation.

Regards,

Frank

**Frank Zhu, Ph.D.**

Senior Associate

**Baker Botts L.L.P.**

[frank.zhu@bakerbotts.com](mailto:frank.zhu@bakerbotts.com)

T +1.212.408.2639

F +1.212.259.2439

M +1.646.853.5581

---

**From:** Robert Scheffel <rscheffel@dowdscheffel.com>

**Sent:** Tuesday, March 28, 2023 1:17 PM

**To:** Williams, Eliot D. <Eliot.Williams@BakerBotts.com>; Tempesta, Jennifer C.

<jennifer.tempesta@bakerbotts.com>; Zhu, Frank <frank.zhu@BakerBotts.com>; Zhang, Boyang

<boyang.zhang@bakerbotts.com>

**Cc:** Matthew Dowd <mdowd@dowdscheffel.com>; Joshua Goldberg <JGoldberg@Nathlaw.com>

**Subject:** IPR2023-00365 -- U.S. Patent No. 8,591,852 -- Chengda v. Doriomo

[EXTERNAL EMAIL]

Counsel,

We represent Patent Owner, Doriamo, Ltd., in the above-captioned IPR. Pursuant to 37 C.F.R. § 42.54(a), we write to discuss an anticipated motion to enter the PTAB's Default Protective Order. We anticipate that the Patent Owner's submissions in the IPR, including a Patent Owner Preliminary Response, may include confidential information of both Chengda and Doriamo. Please let us know if Chengda consents to such a motion, or if not, when you have time to meet and confer on this issue.

Regards,

Robert

Robert J. Scheffel

[Dowd Scheffel PLLC](#)

[www.dowdscheffel.com](http://www.dowdscheffel.com)

1717 Pennsylvania Ave., Ste. 1025

Washington, DC 20006

(202) 559-9175 (o)

(703) 859-2959 (m)

<http://www.linkedin.com/in/robertscheffel>

**Confidentiality Notice:**

The information contained in this email and any attachments is intended only for the recipient[s] listed above and may be privileged and confidential. Any dissemination, copying, or use of or reliance upon such information by or to anyone other than the recipient[s] listed above is prohibited. If you have received this message in error, please notify the sender immediately at the email address above and destroy any and all copies of this message.