

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

SEMANTIC ENGINES LLC,

Plaintiff,

v.

MICROSOFT CORPORATION,

Defendant.

Civil Action No. 2:26-cv-339-JRG

JOINT MOTION FOR ENTRY OF PARTIALLY DISPUTED PROTECTIVE ORDER

Plaintiff Semantic Engines LLC (“Semantic”) and Defendant Microsoft Corporation (“Microsoft”) file this Joint Motion for Entry of Partially Disputed Protective Order, attached as Exhibit 1. The parties agree on all provisions except those contained in highlighted text in Paragraphs 14 and 30. For each disputed provision, the highlighted text presents each party’s competing proposed language, with supporting arguments in corresponding footnotes.

The parties respectfully request that the Court resolve the disputed provisions and enter the proposed protective order.

Date: August 10, 2026

Respectfully submitted,

/s/ Melissa R. Smith

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CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(h) and (i), the Parties met and conferred about the proposed protective order by teleconference on August 7, 2026 and were able to reach agreement on all provisions except the highlighted provisions, for which the parties reached an impasse. Andres Healy and Kaholi Kiyonami attended on behalf of Plaintiff, and Elizabeth M.C. Scheibel attended on behalf of Defendant.

/s/ Andres C. Healy
Andres C. Healy

CERTIFICATE OF SERVICE

The undersigned hereby certifies that this document was filed electronically via the Court's CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Andres C. Healy
Andres C. Healy