

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC
Petitioner

v.

PERSONALIZED MEDIA COMMUNICATIONS, LLC
Patent Owner

Case No. IPR2020-00723
U.S. Patent No. 7,747,217

PATENT OWNER'S MOTION TO SEAL

Together with the Preliminary Response, Patent Owner is filing the table of contents excerpted from Petitioner's Invalidity Expert Report submitted in the parallel district court action involving the same patent, Ex. 2016. The excerpted table of contents bears the "Highly Confidential - Attorneys' Eyes Only" stamp placed thereon by Petitioner. However, Petitioner's counsel in the district court action stated "[Petitioner] designated the . . . report under the Protective Order based on [Patent Owner's] designation of materials cited therein, not any [Petitioner] confidential information."

Patent Owner's position is that the Expert Report contains Patent Owner's highly confidential information, but the excerpted table of contents contains no confidential information and does not need to be sealed. However, to the extent that Petitioner believes that good cause exists to seal Ex. 2002, Patent Owner does not oppose. Patent Owner submits that the default protective order set forth in Appendix B of the November 2019 Consolidated Trial Practice Guide (and attached as Exhibit A to Petitioner's Motion to Seal, Paper 3) is sufficient.

Case No.: IPR2020-00723
Patent No: 7,747,217

Patent Owner's Motion to Seal

Respectfully submitted,

Date: June 25, 2020

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*Attorneys for Patent Owner Personalized
Media Communications, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on June 25, 2020, a true and correct copy of
Personalized Media Communications, LLC's above Motion to Seal in IPR2020-
00723 was served via e-mail upon Erika H. Arner, Daniel C. Cooley, Joshua L.
Goldberg, Cory C. Bell, Sydney R. Kestle, and A. Grace Mills at
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Respectfully submitted,

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