

**UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD**

ONE WORLD TECHNOLOGIES, INC., D/B/A TECHTRONIC
INDUSTRIES POWER EQUIPMENT,
Petitioner,

v.

CHERVON (HK) LIMITED,
Patent Owner.

Case IPR2020-00886
Patent 9,826,686

**PATENT OWNER'S MOTION TO SEAL EXHIBIT 2029 TO
PATENT OWNER'S RESPONSE**

I. Introduction

Patent Owner requests permission to seal Exhibit 2029 to Patent Owner's Response, as this exhibit purportedly contains confidential information belonging to Petitioner. Patent Owner has reached out to counsel for Petitioner to determine what information, if any, needs to be redacted from the exhibit. Patent Owner will file a redacted version of the exhibits once it hears back from Petitioner's counsel.

II. Good Cause Exists To Seal Exhibit 2029

Exhibit 2029 is the transcript of the January 19, 2021 deposition of Lee Sowell. Petitioner's counsel indicated during the deposition that the transcript contains confidential information. While Patent Owner is unable to determine what, if any, information in the transcript should be kept in confidence, Patent Owner's counsel has reached out to Petitioner's counsel to request further clarification as to what information should remain confidential. Patent Owner will file a redacted version of the exhibit once it hears back from Petitioner's counsel.

III. Certification Of Non-Publication

Petitioner and Patent Owner have both taken appropriate steps to maintain the confidentiality of the above-referenced information.

IV. Certification Of Conference With Counsel For Petitioner Pursuant To 37 C.F.R. § 42.54

The undersigned has conferred in good faith with counsel for Petitioner and has reached an agreement as to this Motion and the confidentiality of the above-

described deposition testimony. Additionally, the parties have agreed to adopt the Default Protective Order set forth in the Board's Trial Practice Guide.

V. Protective Order

Petitioner and Patent Owner request entry of the Default Protective Order found in the Board's Trial Practice Guide.

VI. Conclusion

For the foregoing reasons, Patent Owner respectfully requests that Exhibit 2029 to Patent Owner's Response be placed under seal by the Board.

Dated: January 29, 2021

Respectfully submitted,

/s/ James J. Lukas, Jr.

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Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of this Patent Owner's Motion to Seal Exhibit 2029 to Patent Owner's Response has been served on January 29, 2021 by electronic mail to the following:

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Dated: January 29, 2021

/s/ James J. Lukas, Jr.