UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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ACXIOM CORPORATION ET AL.
Petitioner

v.

PHOENIX LICENSING, LLC
Patent Owner

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Case CBM2016-00085
Patent 8,234,184

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**PETITIONER'S MOTION TO SEAL
UNDER 37 CFR §§ 42.14 and 42.55**

Pursuant to 35 U.S.C. § 316 and 37 C.F.R. §§ 42.14 and 42.55, Acxiom

Corporation ("Acxiom"), TIAA-CREF Life Insurance Company ("TIAA-CREF"),

and Teachers Insurance and Annuity Association of America ("TIAA") (collectively,

"Petitioner") respectfully submit this Motion to Seal Exhibits ACXM-1952-58 and

ACXM-1960-61, which are being filed concurrent with the Petition and this Motion,

such that they are available to the Board and Parties only.

In support of this Motion, Petitioner states as follows:

1.   Exhibit ACXM-1952 is a true and correct copy of an agreement between

Acxiom and TIAA and its affiliated entities, including TIAA-CREF, as

redacted, that describes and governs confidential aspects of the

commercial relationships between Acxiom, TIAA, and TIAA-CREF.

2.   Exhibit ACXM-1953 is a true and correct copy of a confidential letter

sent by a representative of Acxiom Corporation's customers, TIAA and

TIAA-CREF, to a representative of Acxiom. The letter relates to the

lawsuit for infringement of U.S. Patent No. 8,234,184 that was filed

against TIAA-CREF.

3.   Exhibits ACXM-1954-56 are true and correct copies of statements of

work, as redacted, that describe and govern confidential aspects of the

commercial relationships between Acxiom, TIAA, and TIAA-CREF.

4. Exhibit ACXM-1957 is a true and correct copy of a confidential letter sent by a representative of Acxiom to a representative of Acxiom's customers TIAA and TIAA-CREF. The letter relates to the lawsuit for infringement of U.S. Patent No. 8,234,184 that was filed against TIAA-CREF.

5. Exhibit ACXM-1958 is a declaration that describes confidential aspects of the commercial relationships between Acxiom, TIAA-CREF, and TIAA.

6. Exhibit ACXM-1960 is a true and correct copy of a confidential letter sent by a representative of Acxiom Corporation's customers, TIAA and TIAA-CREF, to a representative of Acxiom. The letter relates to the lawsuit for infringement of U.S. Patent No. 8,234,184 that was filed against TIAA-CREF.

7. Exhibit ACXM-1961 is a declaration that describes confidential aspects of the commercial relationships between Acxiom, TIAA-CREF, and TIAA.

8. Although certain portions of Exhibits ACXM-1952 and ACXM-1954-56 have been redacted, the unredacted portions are also confidential.

9. The information included in Exhibits ACXM-1952-58, and ACXM-1960-61 is of a truly sensitive nature, and is being offered for the sole

purpose of assisting the Board with understanding Petitioner's grounds

for standing.

For these reasons, Petitioner respectfully requests the Board grant this Motion

to Seal.

Pursuant to 37 CFR § 42.55(a), Petitioner proposes entry of the default

protective order found in Appendix B of the Trial Practice Guide.

Respectfully submitted,

Dated: 6-8-16   / Roberto J. Devoto /
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DEFAULT PROTECTIVE ORDER

The following Standing Protective Order will be automatically entered into the

proceeding upon the filing of a petition for review or institution of a derivation:

Standing Protective Order

This standing protective order governs the treatment and filing of confidential

information, including documents and testimony.

1. Confidential information shall be clearly marked "PROTECTIVE ORDER

   MATERIAL."

2. Access to confidential information is limited to the following individuals who

   have executed the acknowledgment appended to this order:

   (A)Parties. Persons who are owners of a patent involved in the proceeding

      and other persons who are named parties to the proceeding.

   (B)Party Representatives. Representatives of record for a party in the

      proceeding.

   (C) Experts. Retained experts of a party in the proceeding who further

      certify in the Acknowledgement that they are not a competitor to any

      party, or a consultant for, or employed by, such a competitor with

      respect to the subject matter of the proceeding.

   (D) In-house counsel. In-house counsel of a party.

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