

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

SAMSUNG ELECTRONICS CO., LTD. AND  
SAMSUNG ELECTRONICS AMERICA, INC.,  
Petitioner,

v.

SEVEN NETWORKS, LLC,  
Patent Owner.

---

Case IPR2018-01120  
Patent 9,247,019

---

**PETITIONER'S MOTION TO SEAL GOOGLE LLC EXHIBIT**

Pursuant to 37 C.F.R. § 42.54, Petitioner (Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. or “Samsung”) hereby moves to seal certain portions of Exhibit 1030. Good cause exists for granting this motion because the information includes highly confidential information. Exhibit 1030 is a document provided to Samsung by Google LLC subject to a Revised Protective Order (attached hereto as Attachment A) entered into between Google LLC and SEVEN Networks, LLC in IPR2018-01102<sup>1</sup> (the IPR in which Exhibit 1030 was original filed and designated in that proceeding as “GOOGLE EXHIBIT 1040”). It is respectfully requested that this Revised Protective Order govern Exhibit 1030.

**I. GOOD CAUSE EXISTS FOR SEALING CERTAIN CONFIDENTIAL INFORMATION**

The Office Patent Trial Practice Guide provides that “the rules aim to strike a balance between the public’s interest in maintaining a complete and understandable file history and the parties’ interest in protecting truly sensitive information.” 77 FED. REG. 48756, 48760 (Aug. 14, 2012). Further, those rules

---

<sup>1</sup> Petitioner is submitting and signing the exact same Revised Protective Order submitted by Google LLC in IPR2018-01102. Notably, due to a clerical error, Google LLC appears to have labeled that protective order with erroneous header information that references IPR2018-01048 rather than IPR2018-01102. This minor error, however, does not impact the substance of the order.

“identify confidential information in a manner consistent with Federal Rule of Civil Procedure 26(c)(1)(G), which provides for protective orders for trade secret or other confidential research, development, or commercial information.” *Id.* (citing 37 C.F.R. § 42.54).

In accordance with the rules and procedures, Petitioner moves to seal Exhibit 1030, which is a Declaration from Joseph Shear. The public version of Exhibit 1030 is redacted consistent with the public version filed by Google LLC in IPR2018-01102, to protect highly sensitive information pertaining to structure and operation of Google LLC, the internal policies and procedures of Google LLC and certain of its affiliates, and legal agreements between Google LLC and Samsung. As such, Exhibit 1030 is designated as HIGHLY CONFIDENTIAL PROTECTIVE ORDER MATERIAL. Certain non-relevant and/or privileged information has been redacted from the sealed version of Exhibit 1030.

The information that is requested to be sealed is being submitted only to rebut Patent Owner’s arguments regarding real party-in-interest and privity. The information is otherwise unimportant to the merits of this proceeding, and therefore the public’s interest in having access to this information is minimal.

## II. CONCLUSION

For the above reasons, Petitioner requests that certain portions of Exhibits 1030 be placed under seal.

Proceeding No.: IPR2018-01120  
Attorney Docket: 39843-0043IP1

Date: October 12, 2018

/W. Karl Renner/

W. Karl Renner, Reg. No. 41,265  
Roberto Devoto, Reg. No. 55,108  
Jeremy Monaldo, Reg. No. 58,680  
Fish & Richardson P.C.  
3200 RBC Plaza, 60 South Sixth Street  
Minneapolis, MN 55402  
T: 202-783-5070  
F: 877-769-7945

Attorneys for Petitioner

**CERTIFICATE OF SERVICE**

Pursuant to 37 CFR §§ 42.6(e)(1) and 42.6(e)(4)(iii), the undersigned certifies that on October 12, 2018, a complete and entire copy of this Petitioner's Motion to Seal Google LLC Exhibit was provided via email to the Patent Owner by serving the email correspondence addresses of record as follows:

Kenneth J. Weatherwax  
Nathan Lowenstein  
Edward Hsieh  
Parham Hendifar  
Patrick Maloney

LOWENSTEIN & WEATHERWAX LLP  
1880 Century Park East, Suite 815  
Los Angeles, CA 90067

Email: [weatherwax@lowensteinweatherwax.com](mailto:weatherwax@lowensteinweatherwax.com)  
[SEVEN\\_IPRs@lowensteinweatherwax.com](mailto:SEVEN_IPRs@lowensteinweatherwax.com)

\_\_\_\_\_  
/Diana Bradley/

Diana Bradley  
Fish & Richardson P.C.  
3200 RBC Plaza  
60 South Sixth Street  
Minneapolis, MN 55402  
(858) 678-5667

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.