

PGR2020-00046

Petitioner's Motion to Expunge Confidential Document

Filed on behalf of Supercell Oy

By:

BRIAN HOFFMAN, Reg. No. 39,713

MICHAEL J. SACKSTEDER (*pro hac vice*)

KEVIN X. MCGANN, Reg. No. 48,793

JENNIFER R. BUSH, Reg. No 50,784

GEOFFREY MILLER (*pro hac vice*)

ERIC Y. ZHOU, Reg. No. 68,842

FENWICK & WEST LLP

555 California Street, 12th Floor

San Francisco, CA 94104

Telephone: 415.875.2300

Facsimile: 650.938.5200

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SUPERCCELL OY,
Petitioner

v.

GREE, INC.,
Patent Owner.

Case No. PGR2020-00046

Patent 10,328,347

PETITIONER'S MOTION TO EXPUNGE CONFIDENTIAL DOCUMENT

TABLE OF CONTENTS

	Page
I. INTRODUCTION	1
II. APPLICABLE LEGAL STANDARDS.....	1
III. GOOD CAUSE EXISTS FOR EXPUNGING THE CONFIDENTIAL DOCUMENT	2
IV. CONCLUSION.....	3

TABLE OF AUTHORITIES

Page(s)

CASES

Atlanta Gas Light Co. v. Bennett Regulator Guards, Inc.,
IPR2013-00453, Paper 97 (P.T.A.B. Apr. 15, 2015)2

STATUTES AND RULES

35 U.S.C. § 324(a)3

OTHER AUTHORITIES

37 C.F.R. § 42.561, 3

Trial Practice Guide, 77 Fed. Reg. at 48,7611

EXHIBIT LIST (37 CFR § 42.63(e))

Exhibit	Description
1001	U.S. Patent No. 10,328,347 to Eda
1002	File History of U.S. Patent No. 10,328,347
1003	U.S. Patent No. 9,597,594 to Eda
1004	File History of U.S. Patent No. 9,597,594
1005	<i>The History of Chess, From the Time of the Early Inventions of the Game in India, till the Period of its Establishment in Western and Central Europe</i> , Duncan Forbes, LL.D. (Wm. H. Allen & Co. 1860) (selected pages)
1006	<i>Correspondence Chess in America</i> , Bryce C. Avery (2000) (selected pages)
1007	<i>Microsoft Computer Dictionary</i> , 4th Ed. (1999)
1008	Declaration of Mark L. Claypool, Ph.D.
1009	Curriculum Vitae for Mark Claypool
1010	Declaration of Antti Takala Regarding Clash of Clans Version 4.120 ("Clash")
1011	Declaration of Sean Olesiuk [Mastermind's In-Game Builder Idea (with LOADS of pictures!) ("Mastermind")]
1012	U.S. Patent No. 9,079,105 to Jeong Hun Kim et al. ("Kim")
1013	Gratuitous Space Battles Manual, Version 1.1, and related links ("GSB")
1014	U.S. Patent Pub. No. 2007/0105626 to Cho et al. ("Cho")
1015	Review of Clash of Clans by PocketGamer

Exhibit	Description
1016	Declaration of Christopher Butler and associated Internet Archive materials
1017	Eastern District of Texas Standing Order Regarding the Novel Coronavirus (COVID-19)
1018	Eastern District of Texas General Order 20-03
1019	Claim Construction Memorandum Opinion and Order, entered on May 14, 2020, Case Nos. 19-cv-00071, 19-cv-00161, 19-cv-00200, and 19-cv-00237 (E.D. Texas)
1020	Scott McKeown, <i>Congress Urged to Investigate PTAB Discretionary Denials</i> , Patents Post-Grant (June 30, 2020)
1021	Scott McKeown, <i>District Court Trial Dates Tend to Slip After PTAB Discretionary Denials</i> , Patents Post-Grant (July 24, 2020)
1022	Declaration of Umeya
1023	Third Docket Control Order, entered July 28, 2020, Case Nos. 19-cv-000161, 19-cv-00172, 19-cv-00200, and 19-cv-000237 (E.D. Texas)
1024	Plaintiff's Opposition to Defendant's Motion for Relief re Governmental Restrictions re COVID-19 (19-00161), Dkt. 102
1025	Supplemental Declaration of Dr. Mark Claypool Regarding Mastermind Exhibit
1026	Clash of Clans Internal Release Notes
1027	Evidence Corroborating Clash
1028	Fourth Amended Document Control Order, entered August 21, 2020 [Dkt. 126] Civil Case No. 19-cv-00200-JRG-RSP (E.D. Tex.)
1029	Amended Docket Control Order, entered October 7, 2020 [Dkt 131] Civil Case No. 19-cv-00200-JRG-RSP (E.D. Tex.)

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.