

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

EMERSON ELECTRIC CO., FISHER-ROSEMOUNT SYSTEMS, INC., and ROSEMOUNT INC.,

Plaintiffs,

v.

SIPCO, LLC, and IP CO, LLC (d/b/a INTUS IQ),

Defendants.

Civil Action  
File No. 1:15-cv-00319-AT

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SIPCO, LLC, and IP CO, LLC (d/b/a INTUS IQ),

Plaintiffs,

v.

EMERSON ELECTRIC CO., EMERSON PROCESS MANAGEMENT LLLP, FISHER-ROSEMOUNT SYSTEMS, INC., ROSEMOUNT INC., BP p.l.c., BP AMERICA, INC., and BP AMERICA PRODUCTION COMPANY,

Defendants.

Civil Action  
File No. 1:16-cv-02690-AT

**SIPCO, LLC AND IP CO, LLC'S MOTION FOR LEAVE TO FILE  
THEIR MOTION TO TRANSFER VENUE AND SUPPORTING  
MEMORANDUM PARTIALLY UNDER SEAL**

SIPCO, LLC and IP CO, LLC (collectively, “SIPCO”) respectfully seek leave to file their Motion to Transfer Venue to the Eastern District of Texas (“Motion”) and Memorandum in Support of Their Motion to Transfer Venue to the Eastern District of Texas (“Memorandum”) partially under seal. Portions of SIPCO’s Memorandum and supporting exhibits recite information disclosed to SIPCO through documents produced by the Emerson parties in this litigation. Those documents were produced by Emerson with CONFIDENTIAL or ATTORNEYS EYES ONLY designations pursuant to the Protective Order entered by this Court and the Protective Order entered by the Eastern District of Texas court in the above-captioned actions. Out of respect for Emerson’s request to keep this information confidential and in order to comply with the Protective Orders entered in the above-captioned actions, SIPCO seeks to file publicly through ECF a redacted copy of its Memorandum and supporting exhibits.

For the foregoing reasons, SIPCO requests that this Court grant leave to file partially under seal SIPCO’s Motion, Memorandum, and supporting exhibits. The redacted copy is submitted with this motion as Attachment 1.

This 2nd day of August, 2016.

/s/ J. Christopher Fox, II  
J. Christopher Fox, II  
Georgia Bar No. 272527  
Michael Coleman  
Georgia Bar No. 177635  
**Thompson Hine LLP**  
Two Alliance Center, Suite 1600  
3560 Lenox Road  
Atlanta, Georgia 30326  
Telephone: 404-541-2900  
Facsimile: 404-541-2905  
Chris.Fox@ThompsonHine.com  
Michael.Coleman@ThompsonHine.com

Paul J. Cronin, *Pro hac vice*  
James C. Hall, *Pro hac vice*  
Timothy J. Reppucci, *Pro hac vice*  
Nutter, McClennen & Fish LLP  
155 Seaport Boulevard  
Boston, Massachusetts 02210-2604  
Telephone: 617-439-2000  
Facsimile: 617-310-9000  
pcronin@nutter.com  
jhall@nutter.com  
treppucci@nutter.com

*Counsel for SIPCO, LLC and IP CO, LLC*

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1**

The undersigned hereby certifies that this filing was prepared using one of the font and point selections approved by this Court in Local Rule 5.1C.

Specifically, Times New Roman font was used in 14 point.

/s/ J. Christopher Fox, II  
J. Christopher Fox, II  
Georgia Bar No. 272527

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served all counsel of record with a copy of the within and foregoing *SIPCO, LLC and IP CO, LLC's MOTION FOR LEAVE TO FILE THEIR MOTION TO TRANSFER VENUE AND SUPPORTING MEMORANDUM PARTIALLY UNDER SEAL* using the Court's ECF filing system, which will automatically send a copy to all counsel of record registered to receive service thereby, and also by U.S. Mail, postage prepaid, upon the following:

Donald L. Jackson  
James D. Berquist  
J. Scott Davidson  
Davidson Berquist Jackson & Gowdey, LLP  
8300 Greensboro Drive, Suite 500  
McLean, Virginia 22102

William V. Custer  
Damon J. Whitaker  
Bryan Cave, LLP  
One Atlantic Center, Fourteenth Floor  
1201 W. Peachtree St., N.W.  
Atlanta, Georgia 30309

Ryan T. Pumpian  
Bloom Sugarman LLP  
977 Ponce de Leon Ave., NE  
Atlanta, Georgia 30306

J. Christopher Fox, II  
J. Christopher Fox, II