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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CRS ADVANCED TECHNOLOGIES, INC.,
Petitioner,

v.

Patent of FRONTLINE TECHNOLOGIES, INC.,
Patent Owner.

Case CBM2012-00005
Patent 6,675,151C1

**PETITIONER CRS ADVANCED TECHNOLOGIES, INC.'S
MOTION TO FILE DOCUMENTS UNDER SEAL**

MAIL STOP PATENT BOARD
Patent Trial and Appeal Board
U.S. Patent & Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

I. Relief Requested

Pursuant to 37 C.F.R. § 42.14, Petitioner CRS Advanced Technologies, Inc. (“CRS”) hereby requests permission to file its Petitioner CRS Advanced Technologies, Inc.’s Reply to Patent Owner’s Response Pursuant to 37 C.F.R. § 42.220 (“Reply”) and selected exhibits, due on May 20, 2013, under seal. The parties have agreed that the Protective Order (CRS Ex. 1018) previously entered by the District Court governs the treatment of confidential materials before the Patent Trial and Appeal Board (the “Board”).

II. Statement of Facts Showing There is Good Cause for the Board to Allow the Filing Under Seal

In accordance with Paragraph 15 of the Protective Order (CRS Exh. 1018), “all transcripts of depositions, exhibits, answers to interrogatories, pleadings, briefs, and other documents submitted . . . that have been designated as CONFIDENTIAL INFORMATION or that contain information so designated, shall be filed (or otherwise submitted) under seal.”

CRS’s Reply includes documents and information designated by Patent Owner under the Protective Order as “CONFIDENTIAL.” More specifically, CRS’s Reply and selected exhibit being filed concurrently with the Reply include a

deposition transcript (CRS Ex. 1015) and a license agreement involving the patent at issue in this proceeding (CRS Ex. 1016), that have been designated by Patent Owner under the Protective Order as “CONFIDENTIAL.”

Petitioner CRS submits that Patent Owner’s designation of these materials as “CONFIDENTIAL” under the Protective Order constitutes good cause for the Board to allow the filing under seal pursuant to 37 C.F.R. § 42.14.

III. Conclusion

For the foregoing reasons, Petitioner CRS respectfully requests that the Board enter the proposed Protective Order, grant this motion, and permit the filing of its Reply to Patent Owner’s Response Pursuant to 37 C.F.S. § 42.220 and selected exhibits under seal. A public, non-confidential version of CRS’s Reply is being separately filed with the Board.

Respectfully submitted,

Dated: May 20, 2013

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CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of May, 2013, a true and correct copy of the foregoing PETITIONER CRS ADVANCED TECHNOLOGIES, INC.'S MOTION TO FILE DOCUMENTS UNDER SEAL was served, in accordance with the parties' electronic service agreement, by electronic mail upon the following lead and backup counsel of record for Patent Owner Frontline

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