

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

APPLE INC.

Petitioner

v.

SIGHTSOUND TECHNOLOGIES, LLC

Patent Owner

---

Case CBM2013-00020

Patent 5,191,573

---

Before the Honorable MICHAEL P. TIERNEY, JUSTIN T. ARBES, and  
GEORGIANNA W. BRADEN,  
*Administrative Patent Judges.*

**MOTION TO FILE CONFIDENTIAL DOCUMENTS UNDER SEAL  
PURSUANT TO 37 C.F.R. §§ 42.14 & 42.54**

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, Petitioner Apple Inc. (“Petitioner” or “Apple”) respectfully submits this Motion to Seal portions of Petitioner’s Motion to Exclude, which is being filed concurrently with this Motion.

## **I. Background**

In this proceeding, SightSound produced certain material that was included in previous filings and is the subject of a pending Joint Motion to Seal (Docket 54), seeking to maintain the confidentiality of that material.

## **II. Good Cause Exists For Sealing Certain Confidential Information**

For the reasons detailed in the parties’ prior Joint Motion to Seal (Docket 54), portions of Petitioner’s Motion to Exclude should be sealed for the same reason.

Dated: April 4, 2014

Respectfully submitted,

By /J. Steven Baughman/  
J. Steven Baughman, Lead Counsel  
Registration No. 47,414  
[steven.baughman@ropesgray.com](mailto:steven.baughman@ropesgray.com)  
Ching-Lee Fukuda, Back-up Counsel  
Registration No. 44,334  
[ching-lee.fukuda@ropesgray.com](mailto:ching-lee.fukuda@ropesgray.com)  
James R. Batchelder, Back-up Counsel  
*Pro Hac Vice* Granted  
[james.batchelder@ropesgray.com](mailto:james.batchelder@ropesgray.com)  
ROPES & GRAY LLP  
Prudential Tower  
800 Boylston Street  
Boston, Massachusetts 02199-3600  
(202) 508-4606 (Telephone)  
(617) 235-9492 (Fax)  
Attorneys/Agents For Petitioner

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

**APPLE INC.**  
Petitioner

v.

**SIGHTSOUND TECHNOLOGIES, LLC**  
Patent Owner

---

Case CBM2013-00020  
Patent 5,191,573

---

Before the Honorable MICHAEL P. TIERNEY, JUSTIN T. ARBES, and  
GEORGIANNA W. BRADEN, *Administrative Patent Judges*.

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Motion to File Confidential Documents Under Seal Pursuant to 37 C.F.R. §§ 42.14 & 42.54 in connection with Covered Business Method Review Case CBM2013-00020 was served on this 4th day of April, 2014, by electronic mail upon Arnold & Porter LLP, counsel for Patent Owner, at david.marsh@aporter.com and kristan.lansbery@aporter.com.

Dated: April 4, 2014

By /Megan F. Raymond /  
Megan F. Raymond