### UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

**APPLE** INC.

Petitioner

v.

SIGHTSOUND TECHNOLOGIES, LLC

Patent Owner

Case CBM2013-00023 Patent 5,966,440

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 48), 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 48), portions of Petitioner's Motion to Exclude should be sealed for the same reason.

Dated: April 4, 2014 Respectfully submitted,

By /I. Steven Baughman/ J. Steven Baughman, Lead Counsel Registration No. 47,414 steven.baughman@ropesgray.com Ching-Lee Fukuda, Back-up Counsel Registration No. 44,334 ching-lee.fukuda@ropesgray.com James R. Batchelder, Back-up Counsel Pro Hac Vice Granted 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



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#### 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 CBM2013-00023 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

