

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SAMSUNG ELECTRONICS AMERICA, INC. AND

SAMSUNG ELECTRONICS CO., LTD.,

Petitioner,

v.

SMARTFLASH LLC,

Patent Owner.

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Case CBM2014-00194

Patent 8,118,221

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**PATENT OWNER'S MOTION TO SEAL**

Pursuant to 37 C.F.R. § 42.14, Patent Owner Smartflash, LLC moves that the Board seal Exhibit 2057 and Patent Owner's unredacted Patent Owner's Response, which refers to that exhibit. Pursuant to Appendix B to the Trial Practice Guide, Petitioner is concurrently filing a non-confidential version of the Petition with the confidential material redacted.

Exhibit 2057 is the transcript of the Confidential Portion of the Deposition of Jeffery Adam Bloom, PhD taken on May 20, 2015. It is unclear at the time of filing Patent Owner's Response whether Dr. Bloom's employer, SiriusXM desires to maintain the confidentiality designation and counsel for Petitioner could not give counsel for Patent Owner a definitive answer before the deadline for filing. Good cause therefore exists for sealing this exhibit, redacting reference to it in the publicly filed Patent Owner's Response and treating it as PROTECTIVE ORDER MATERIAL under the Board's Standing Protective Order until such time as counsel for Petitioner can give a definitive answer.

For the foregoing reasons, Patent Owner respectfully requests that the Board enter an Order sealing the unredacted version of Patent Owner's Response and Exhibit 2057.

Dated: June 1, 2015

/ Michael R. Casey /

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## CERTIFICATE OF SERVICE

The undersigned hereby certifies that this PATENT OWNER'S MOTION TO SEAL was served, by agreement of the parties, June 1, 2015 by emailing copies to counsel for the Petitioner as follows:

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Dated: June 1, 2015

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