

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE PATENT TRIAL AND APPEAL BOARD**

In re Covered Business Method Review )  
of: )  
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U.S. Patent No. 8,794,516 )  
 )  
Issued: August 5, 2014 )  
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Inventors: Patrick Sandor Racz and )  
Hermen-ard Hulst )  
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Application No. 13/438,754 )  
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Filed: April 3, 2012 )  
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For: DATA STORAGE AND )  
ACCESS SYSTEMS )

Attorney Docket No:  
01980-00035-51601

Petitioner: Google Inc.

**MOTION TO SEAL AND FOR ENTRY OF PROTECTIVE ORDER**

**Mail Stop Patent Board**  
Patent Trial and Appeal Board  
U.S.P.T.O.  
P.O. Box 1450  
Alexandria, VA 22313-1450

Pursuant to 37 C.F.R. §42.14, Petitioner Google Inc. requests that the Board seal Exhibit 1016 and Petitioner's unredacted Petition for Covered Business Method Review, 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 1016 is excerpts from the Patent Owner's infringement contentions served in the underlying litigation. The Patent Owner contends that these infringement contentions contain its confidential analysis and has designated them confidential pursuant to the Protective Order entered in the district court litigation. As such, dissemination of this exhibit is limited by the district court's Protective Order. The Patent Owner has further requested that any filing of this exhibit or reference to it be accompanied by a Motion to Seal. Good cause therefore exists for sealing this exhibit, redacting reference to it in the publicly filed Petition for Covered Business Method Review, and entering the attached Protective Order.

Attached hereto is a proposed Protective Order. This Protective Order is based on the model protective order contained in Appendix B to the Trial Practice Guide. Additional requested provisions, which are based on provisions in the district court protective order in the underlying litigation, to which the parties agreed in that proceeding, are indicated in redline.

For the foregoing reasons, Petitioner respectfully requests that the Board enter an Order sealing the unredacted version of Petitioner's Petition for Covered Business Method Review and Exhibit 1016 and requiring the parties to abide by the attached Protective Order.

Dated: May 13, 2015

Respectfully submitted,

*/Raymond N. Nimrod/*

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*Counsel for Petitioner Google Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that, on May 13, 2015, I caused a true and correct copy of the foregoing Motion to Seal and for Entry of Protective Order to be served via Federal Express Priority Overnight to the below addresses:

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Date: May 13, 2015

*/Andrew M. Holmes/*  
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