

Filed on behalf of: Software Rights Archive, LLC

Paper _____

By: Martin M. Zoltick, Lead Counsel
Nancy J. Linck, Back-up Counsel
Soumya P. Panda, Back-up Counsel
Rothwell, Figg, Ernst & Manbeck, P.C.
607 14th St., N.W., Suite 800
Washington, DC 20005
Telephone: 202-783-6040
Facsimile: 202-783-6031
E-mail: mzoltick@rfem.com
nlinck@rfem.com
spanda@rfem.com

Filed: February 6, 2015

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FACEBOOK, INC., LINKEDIN CORP., and TWITTER, INC.,
Petitioners,

v.

SOFTWARE RIGHTS ARCHIVE, LLC,
Patent Owner.

Case IPR2013-00480
Patent 5,832,494

**REQUEST FOR THE WITHDRAWAL OF MOTION TO SEAL, TO
EXPUNGE EXHIBIT 2114, AND TO REPLACE EXHIBIT 2114 WITH A
REDACTED VERSION**

In accordance with the Final Written Decision – 35 U.S.C. § 318(a) and 37 C.F.R. § 42.73, dated January 30, 2015 (Paper 55), Patent Owner Software Rights Archive, LLC (“Patent Owner”) hereby requests that:

- (1) Patent Owner’s Motion to Seal Exhibit 2114, dated May 19, 2014 (Paper 33) be withdrawn;
- (2) Exhibit 2114 be expunged from the record; and
- (3) Exhibit 2114 be replaced with a redacted version that has had the confidential information removed.

Petitioners Facebook, Inc., LinkedIn Corp., and Twitter, Inc. (“Petitioners”) do not oppose Patent Owner’s request to replace Exhibit 2114 (Langville Declaration) with the redacted version of Exhibit 2114 filed concurrently herewith.

The redacted version of Exhibit 2114 is being filed concurrently with this paper.

Respectfully submitted,

Date: February 6, 2015

By: /s/ Martin M. Zoltick

Martin M. Zoltick, Reg. No. 35,745
Nancy J. Linck, Reg. No. 31,920
Soumya P. Panda, Reg. No. 60,447
Rothwell, Figg, Ernst & Manbeck, P.C.
607 14th Street, N.W., Suite 800
Washington, DC 20005
Phone: 202-783-6040
Facsimile: 202-783-6031

*Attorneys for Patent Owner
Software Rights Archive, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of February, 2015, a true and correct copy of the foregoing REQUEST FOR THE WITHDRAWAL OF MOTION TO SEAL, TO EXPUNGE EXHIBIT 2114, AND TO REPLACE EXHIBIT 2114 WITH A REDACTED VERSION was served by electronic mail, upon the following lead, backup and *pro hac vice* counsel of record for Petitioners Facebook, Inc., LinkedIn Corp. and Twitter, Inc.:

Heidi L. Keefe – Lead Counsel for all Petitioners
Cooley LLP
1299 Pennsylvania Ave., N.W., Suite 700
Washington, DC 20004
Ph: 650-843-5001
Fx: 650-849-7400
E-mails: hkeefe@cooley.com

Mark R. Weinstein – *Pro Hac Vice* Backup Counsel for Facebook, Inc.
Cooley LLP
1299 Pennsylvania Ave., N.W., Suite 700
Washington, DC 20004
Ph: 650-843-5007
Fx: 650-849-7400
E-mail: mweinstein@cooley.com

David Silbert – *Pro Hac Vice* Backup Counsel for LinkedIn Corp. and Twitter, Inc.
Keker & Van Nest LLP
633 Battery Street
San Francisco, CA 94111
Ph: 415-391-5400
Fx: 415-397-7188
E-mail: djs@kvn.com

Asim M. Bhansali – *Pro Hac Vice* Counsel for LinkedIn Corp. and Twitter, Inc.

Keker & Van Nest LLP
633 Battery Street
San Francisco, CA 94111
Ph: 415-391-5400
Fx: 415-397-7188
E-mail: abhansali@kvn.com

Sharif E. Jacobs – *Pro Hac Vice* Counsel for LinkedIn Corp. and Twitter, Inc.

Keker & Van Nest LLP
633 Battery Street
San Francisco, CA 94111
Ph: 415-391-5400
Fx: 415-397-7188
E-mail: sjacob@kvn.com

/s/ Erik van Leeuwen _____

Erik van Leeuwen
Litigation Operations Coordinator
Rothwell, Figg, Ernst & Manbeck, P.C.